TSD File Inventory Index

Date: Jernany 6,2001

nitial: <u>CM Levya</u>

acility Name: GILC (Fisher B	0 dy _ 0	Civilian- Fleetwood Plint - Ox Albertel	7
acility Identification Number: MD 98	PB 70	70 87L	
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Tetal-1

.6 CMI Correspondence		.9 Environmental Justice	
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.6 CMS Progress Reports		.1 Human/Ecological Assessment	red comp
7 .5 Stabilization		G.1 Rick Assessment	ana a transfer in the latest and the
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.3 CMS Workplan		.2 Reports	Transmitter (1) Property (1)
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Note: Transmitted Letter to Be Included with Reports.
Comments: Documents do not qualitation industribut filder per schedule:

A.1 Public Participation

c.4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF LIBRARY: Detroit Public Library, Main, Bowen, Campbell, and Conely LIBRARY CONTACT: Branches. Doris Detwiler, Reference Division, Sociology LIBRARY LOCATION: and Economics Department, 5201 Woodward Avenue, Detroit, Michigan 48202

FACILITY NAME: General Motors Corporation, Fisher Body Fleetwood Plant FACILITY LOCATION: West Fort Street and West End Avenue DE CE FACILITY U.S. EPA ID MO: MID980700876

MATERIALS RECEIVED: Four Sets Of:

Public Notice Closure Plan Background Materials Return Envelopes Verification Sheet WASTE MANAGEMENT BRANCH

MAR 08 1984

世色DATE	RECEIVE) a	3-6.	-84			
**DATE	OF PUBL	IC AVAILAS	LITY:	Same	3-6-	84	
**SIGN	ATURE OF	RECEIVING	PARTY:	0,00	lent	sky	
PLEA	SE RETUR	(IN SELF	-ADDRESSE	D. POSTAGE A	ND FEFS	PAID ENVELOPES	mar and

U.S. ENVIRONMENTAL PROTECTION AGENCY 230 SOUTH DEARBORN 5HW-13 CHICAGO, ILLINOIS 60604

ATTENTION: DIAME SHARROW

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

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MATERIALS RECEIVED: Four Sets Of:

Public Notice Closure Plan Background Materials Return Envelopes Verification Sheet

PASTE MANAGEMENT

MAR 07 1984

**DATE RECEIVED: 2/	29/84
**DATE OF PUBLIC AVAILABILITY:	3/3/84
**SIGNATURE OF RECEIVING PARTY:_	Doris Watwiler

PLEASE RETURN (IN SELF-ADDRESSED, POSTAGE AND FEES PAID ENVELOPE) TO:

U.S. ENVIRONMENTAL PROTECTION AGENCY 230 SOUTH DEARBORN 5HW-13 CHICAGO, ILLINOIS 60604

ATTENTION: DIANE SHARROW

ts. Deris Cetaller Catroit Public Library Reference Division Sociology and Economics Department 5201 Moodward Avenue Detroit, Michigan 48202

Dear Ma. Detwiler:

Pursuant to my telephone conversation with you on february 22, 1934, I am sending you copies of the Closure Plan and related background exterials for the General Meters Corporation, Fisher Rody Fleetwood Plant. These materials are to be sade available to the public for review and connect through April 12, 1984, at the following four branches of the Detroit Public Library: the Main Branch, the Campbell Branch, the Conely Branch, and the Bowen Branch. I am also enclosing an advance copy of the Public Notice, advising the public of the availability of the enclosed exterials at these four library branches. The Public Rotice is scheduled to be published in the Betroit Reys on March 11, 1984.

Please return these materials in the enclosed self-addressed envelopes following the close of the 30-day comment period on April 12, 1984. Please inform se that you have received these materials by completion and signing the enclosed verification form. The form should be returned to se in the enclosed self-addressed, postage, and fees paid envelope.

Thank you very much for your cooperation in assisting our affort to serve the public.

Sincerely,

Diame M. Sharrow Environmental Protection Assistant

Coctosures

5HW: WHE: RAIU USHARROW/ADS

112 REAL

CONTACT: DIANE SHARROW (312) 886-3718
September 1973
4 Treasury FRM 2000 Standard Form No. 1143 ADVERTISING ORDER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
U.S. Environmental Protection Agency, Waste Management Branch

02-23-84

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates

charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN	
The Detroit News	
SUBJECT OF ADVERTISEMENT	EDITION OF PAPER ADVERTISEMENT APPEARED
Public Notice	P.M.
NUMBER OF TIMES ADVERTISEMENT APPEARED	DATE(s) ADVERTISEMENT APPEARED
Single	March 11, 1984

SPECIFICATIONS FOR ADVERTISEMENT

Place in Legal Notice/Classified Advertising Section

COPY FOR ADVERTISEMENT

Please see the attached

	AUTHORITY TO ADVERTISE	INSTRUMENT OF A	SSIGNMENT
NUMBER		NUMBER	
DATE		DATE	
SIGNATURE OF	AUTHORIZING OFFICIAL	TITLE	

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C.-5576-H., consisting of 11,000 sq. vds. PCC Class BB sidewalk repair and 2,000 cu. vds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Officer, D.C. Scaled bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1985.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to

U.S. Environmental Protection Agency Financial Operations Section 230 South Dearborn, Chicago, Illinois

IMPORTANT

60604

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

	PUBLIC VOUC	HER FOR ADVERTISE	NG	For Agency Use Only
DE	PARTMENT OR ESTABLISHMENT, BUREAU OR		_	VOUCHER NUMBER
PL	U.S. Environmental Protect		DATE PREPARED	SCHEDULE NUMBER
NA	230 South Dearborn, Chicag	o, Illinois 60604	02-23-84	PAID BY
NA	The Detroit News ME OF PUBLISHER OR REPRESENTATIVE			
	The Detroit News, Incorpor			
ΑĐ	OR' Street, room number, city, State, and ZIP of 615 LaFayette Boulevard, D		221 2000 Tame 1	
	Notices, Classified Advert			
1		CHARGES		
ΓYF	PEFACE	(size of type)	(inch, square, TPER	word, or folio)
		NUMBER OR LINES (Indicate counted or space)	COST PER LINE	TOTAL COST
Rates	FIRST INSERTION		•	
Ë	ADDITIONAL INSERTIONS GIVE NUMBER >			
	TOTAL		į	\$
		NUMBER OF UNITS (Indicate inch, square, word, folio)	COST PER UNIT	TOTAL COST
r Rates	FIRST INSERTION		\$	\$
Othe	ADDITIONAL INSERTIONS GIVE NUMBER >			
	TOTAL			\$
Att CO	ach one copy of advertisement (including a by of voucher here. If copy is not available	upper and lower rules) to each sign the following affidavit.	TOTAL LINE RATES AND OTHER RATES	
		분별 (전 - 스탠딩트로 1 전 명일	LESS DISCOUNT AT	
			BALANCE DUE VERIFIED (Initials)	\$
		AFFIDAVIT		
•	is represents a true billing for the attached	***************************************	fications and copy, which has	been completed.
1				
TIT		A.A. A. Marian M	DATE	
: :		FOR AGENCY USE	ONLY	
A	DVERTISEMENT PUBLISHED IN			DATE PUBLISHED
I p	certify that the advertisement described a ayment.	above appeared in the named	publication and that this acco	ount is correct and eligible for
S	GNATURE AND TITLE OF CERTIFYING OFFICER			DATE
S	GNATURE AND TITLE OF AUTHORIZING OFFIC	ER		DATE
	Account Estimate: \$4.24 per line / Public Notice has aproximate Total: \$224.72			PAID BY CHECK NUMBER
	· 人名英格兰 中国主任首王的首 斯里克克克克			

PUBLIC NOTICE

The United States Environmental Protection Agency (U.S. EPA), has received a certification of change in status from the General Motors Corporation (GMC), Fisher Body Fleetwood Plant, West Fort Street and West End Avenue, Detroit, Michigan. GMC stores hazardous wastes in containers and tanks. This action will change the status of GMC from a storage facility to a generator storing for fewer than 90 days (per 40 CFR 262.34). The status change for this facility was effected by removing hazardous wastes stored for longer than 90 days and by limiting the present accumulation period to fewer than 90 days.

The certification of change in status was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act, as amended. The U.S. EPA required the certification of change in status when GMC requested a change in status from a storage facility to a generator.

The closure plan and related background materials are available to the public at the U.S. EPA, Waste Management Branch, 230 South Dearborn Street, 13th Floor, Chicago, Illinois, (312) 886-3718, from 8:30 a.m. to 4:30 p.m., Monday through Friday. These materials may also be seen during business hours at the following branches of the Detroit Public Library: the Main Branch, 5201 Woodward Avenue; the Campbell Branch, 6625 West Fort Street; the Bower Branch, 3648 West Vernor Avenue; and the Conely Branch, 4600 Martin Avenue.

Public comments concerning the certification of this action are invited by the U.S. EPA and will be accepted through April 12, 1984. Please send comments to:

U.S. Environmental Protection Agency Region V - 5HW-13 230 South Dearborn Street Chicago, Illinois 60604

ATTN: Diane Sharrow



UNITED STALES ENVIRONMENTAL PROTECTION GENCY WASHINGTON, D.C. 20460



MAR 16 1984

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Mr. Thomas E. Clifford Fisher Body Division General Motors Corp. Fleetwood Plant W. Fort Street and West End Ave. Detroit, MI 48209 WI BHF0305

MAD 980 700 879

MAN 100 980 700 879

Dear Mr. Clifford:

The purpose of this letter is to collect data necessary to grant an exclusion under \$260.22 of the RCRA regulations for Fisher Body's (Fleetwood Plant) treatment residue listed as EPA Hazardous Waste No. F006, as requested in your petition submitted on June 22, 1983. Both Houses of Congress are considering bills that would require EPA to revise its petition review procedure under 40 CFR 260.22. Under prior procedures, when a firm petitioned the Agency to exclude its waste from regulatory control, the Agency only considered those constituents in the waste stream which caused the waste to be initially listed. However, in many cases, other hazardous constituents are also present in the waste and we believe that these constituents should also be considered in the delisting review process. Congress shares this concern and is likely to pass a bill amending the Resource Conservation and Recovery Act (RCRA) that will require EPA to determine if other hazardous constituents are adequately characterized and quantified by the petitioner. Given this situation, the Agency has changed the delisting procedures to require all other hazardous constituents that may reasonably be expected to be present in each petitioned waste to be addressed.

Petitioners are now being requested to address additional factors and hazardous constituents other than those for which the petitioned waste was initially listed. Our concern is limited to those constituents for which there is a reasonable basis to believe that their presence in the waste will pose a significant potential threat to human health or the environment. The purpose of this letter is to request that you submit sufficient data to verify that such hazardous constituents are not present at levels of regulatory concern in the petitioned waste for which you have requested an exclusion.

Before the Agency can complete our review of your petition, the following additional information should be provided:

- (1) a more detailed list, description and schematic of all manufacturing processes, including surface and equipment preparation, cleaning and/or degreasing, coating or painting processes, which may contribute waste, wastewater, or rinse water to the waste stream petitioned for exclusion;
- (2) a complete list of all raw materials used, including chemical composition;
- (3) material safety data sheets, if available, identifying all solvents, acids, cleaners, surface preparation agents, paints, etc., used in the manufacturing process which may enter the wastestream petitioned for delisting;
- (4) an identification of sources and types of oils and hydraulic fluids which might enter the waste treatment system;
- (5) more information regarding the professional qualifications of those personnel conducting sampling and analysis (a brief resume will suffice):
- (6) a total constituent analysis of the waste (complete acid digestion) for each of the EP toxic metals, and nickel on a minimum of four representative samples:
- (7) a determination of the total oil and grease content of the waste by testing at least four representative samples using Method No. 502.D of Standard Methods for the Examination Water and Wastewater, 14th Edition enclosed in the attached package;
- (8) a determination of TOC of the waste by testing at least four representative samples using Method No. 415.1 of Methods for Chemical Analysis of Water and Waste (March 1979) enclosed in the attached package.
- (9) please provide all standard addition data and spike concentrations from the standard addition method of recovery analysis.

If after reviewing the data specified above, the Agency finds that organic constituents or other metals are used in your facility's processes, you may be requested to submit representative test data quantifying these constituents in the waste. In order to ensure your petition is reviewed in a timely manner, it is essential you submit the data requested as soon as possible. To facilitate expeditious processing by the Agency please include your facility petition identification number as #0484 in all future correspondence with the Agency.

If you have any questions regarding the data requested above, please do not hesitate to call me at 202-382-4770.

Sincerely,

William Sproat

Environmental Scientist
Waste Identification Branch (WH-562)

Attachments

DRAFT

Constituents of Possible Interest to Refinery Listing Effort

Metals

Antimony
Arsenic
Barium
Beryllium
Cadmium
Chromium
* Cobalt
Lead
Mercury
Nickel
Selenium
Vanadium

Organics

Acetonitrile Acrolein Acrylonitrile Aniline Anthracene Benz(c)acridine Benz(a)anthracene Benzene Benzenethiol Benzidine Benzo(b) fluoranthene Benzo(j)fluoranthene Benzo(k) fluoranthene Benzo(a)pyrene Benzyl chloride Bis(2-chloroethy1)ether Bis(2-chloroisopropyl)ether Bis(chloromethyl)ether Bis(2-ethylhexyl)phthalate Butyl benzyl phtnalate Carbon Disulfide p-Chloro-m-cresol Chlorobenzene Chloroform Chloromethane 2-Chloronapthalene 2-Chlorophenol Chrysene Cresol Crotonaldehyde Dibenz(a,h)acridine Dibenz(a,j)acridine Dibenz(a,h)anthracene 7H-Dibenzo(c,g)carbazole 7,12-Dimethylbenz(a)anthracene Dibenzo(a,e)pyrene Dibenzo(a,h)pyrene

Dibenzo(a,i)pyrene Di-n-butylphthalate 1,1-Dichloroethane Dichlorobenzenes 1,2-Dichloroethane 1,1-Dichloroethylene 1,2-Dichloroethylene Dichloromethane Dichloropropane Dichloropropanol Diethyl phthalate 2,4-Dimethylphenol 7,12-Dimethyl Benz(a)anthracene Dimethylphthalate 4,6-Dinitro-o-cresol 2,4-Dinitrophenol Dinitrotoluene Di-n-octyl phthalate 1,4-Dioxane 1,2-Diphenylhydrazine Ethyleneimine Ethylene dibromide Ethylene oxide Fluoranthene Hydrogen sulfide Hydroquinone Indene Indeno(1,2,3-cd)pyrene Isophorone 2-Methyl Aziridine Methyl Benz(c)phenanthrene Methyl mercaptan 3-Methylcholanthrene Methyl Chrysene Methyl ethyl ketone 1-Methyl naphthalene Naphthalene Naphthylamine 5-Nitroacenapthene p-Nitroaniline Nitrobenzene Nitrophenol N-Nitrosodiethylamine Pentachlorophenol Phenanthrene Phenol Pyrene Pyridine Quinoline

* Styrene
Tetrachloroethanes
Tetrachloroethylene

Toluene

Trichlorobenzenes

Trichloroethanes
Trichloroethylene
Trichlorophenols
Trimethyl Benz(a)anthracene

*= constituents on the Michigan list

+= Not in Appendix VIII, but could appear at significant levels and require listing

Bis(2-chloroethoxy) methane Hexachlorocyclopentadiene 2-Chloronaphthalene Acenaphthylene Acenaphthene Dimethyl phthalate 2,6-Dinitrotoluene Fluorene 4-Chlorophenyl phenyl ether 2,4-Dinitrotoluene Diethylphthalate N-Nitrosodiphenylamine Hexachlorobenzene 4-Bromophenyl phenyl ether Phenanthrene Anthracene Dibutyl phthalate Fluoranthene Pyrene Benzidine Butyl benzyl phthalate Bis(2-ethylhexyl) phthalate Chrysene Benzo(a)anthracene 3,3'-Dichlorobenzidine Di-n-octyl phthalate Benzo(b) fluoranthene Benzo(k)fluoranthene Benzo(a)pryene Benzo(a)anthracene Benzo(c)phenanthrene Methyl chrysene 3-Methylcholanthrene Dibenzo(a,h)anthracene Dibenzo(a,e)pyrene Indeno(1,2,3-c,d)pyrene Benzo(g,h,i)perylene N-Nitrosodimethyl amine

III. Semivolatile Acid Extractable Compounds 2-Chlorophenol
2-Nitrophenol
Phenol
2,4-Dimethylphenol
2,4-Dicholorphenol
2,4,6-Trichlorophenol
4-Chloro-3-methylphenol
2,4-Dinitrophenol
2-Methyl-4,6-dinitrophenol
Pentachlorophenol
4-Nitrophenol
Dimethylamine
Diethylamine

ATTACHMENT A: LIST OF ORGANICS

I. Volatiles Chloromethane Bromomethane Vinyl chloride Chloroethane Methylene chloride Trichlorofluoromethane 1,1-Dichloroethene 1,1-Dichloroethane Chloroform 1,2-Dichloroethane 1,1,1-Trichloroethane Carbon tetrachloride Bromodichloromethane 1,2-Dichloropropane trans-1,3-Dichloropropene Trichloroethene Benzene Dibromochloromethane 1,1,2-Trichloroethane cis-3-Dichloropropene 2-Chloroethylvinyl ether Bromoform 1,1,2,2-Tetrachloroethane Tetrachloroethene Toluene Chlorobenzene Ethyl benzene 1,3-Dichlorobenzene 1,2-Dichlorobenzene 1,4-Dichlorobenzene Xylenes

II. Semivolatile Base/Neutral Extractable Compounds
1,3-Dichlorobenzene
1,4-Dichlorobenzene
Hexachloroethane
Bis(2-chloroethyl) ether
1,2-Dichlorobenzene
Bis(2-chloroisopropyl) ether
N-Nitrosodi-n-propyl amine
Nitrobenzene
Hexachlorobutadiene
1,2,4-Trichlorobenzene
Isophorone
Naphthalene

A.2 Part A/ Interim Status

A DRIVED SA

UNITED STATES **ENVIRONMENTAL PROTECTION ACENCY**

REGION V

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF

5HW-13

C. Kato, General Manager GMC Fisher Body Division 30001 Van Dyke Avenue Warren, Michigan 48090

RE: Permit Application Withdrawal Letter

(Insufficient Information)

FACILITY NAME: GMC-Fisher Body Division-Fleetwood Plant

U.S. EPA ID NO.: MID 980 700 876

Dear Mr. Kato:

This is to acknowledge receipt of your letter of requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request did not contain sufficient information to enable this office to concur with your determination. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265, Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

Please do not hesitate to contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter, (Insufficient Information)," in all telephone contacts and correspondence on this matter.

Sincerely yours.

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure

cc: B. J. Napolitan, Plant Engineer

DEC 2 2 1982

B. J. Napolitan, Plant Engineer GMC - Fisher Body Division Fleetwood Plant West Fort and West End Ave Detroit, Michigan 48209

Dear Mr. Napolitan:

This letter will confirm my December 20, 1982, telephone conversation with Mr. Lloyd Gordon of your staff regarding the United States Environmental Protection Agency (U.S. EPA) identification number (ID#) for the Fleetwood Plant.

Mr. Gordon informed me that your facility located at West Fort and West End Avenue had been using the U.S. EPA ID# MIDOO0274241 for the past two and a half years. I advised him that the number belonged to the GMC Fisher Body, Detroit Central Plant 40 located on 1500 E. Milwaukee. The Fleetwood Plant had been assigned another U.S. EPA ID#, MIT270012586. Enclosed is a copy of that acknowledgement for your information.

The U.S. EPA is in the process of converting temporary ID#s to permanent ones for all facilities that treat, store, or dispose of hazardous waste. The Fleetwood Plant's new permanent ID# is MID980700876. This number should be used effective January 1, 1983.

I advised Mr. Gordon to report the Fleetwood Plant's 1981 Annual Report data using the ID# (MID005356746) for which the waste had been manifested but to attach a letter to the Annual Report noting the facility's existing temporary ID# (MIT270012686) and new permanent ID# (MID980700876).

Please call me at (312) 886-7449, if you have any questions regarding this matter.

Sincerely yours,

Arthur S. Kawatachi Regional Project Officer

Enclosure

cc: Lloyd Gordon Fisher Body, Detroit Central Plt. 40

> Alan Howard Michigan Department of Natural Resources

bcc: Part A file

5HW-TUB: WMD: WMB: SPIS: RAIU: A. KAWATACHI: MO:

12/22/82

THE STATES TO A VERN THE WAY A PROTECTION AGENCY PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604 REPLYRIO ACTIVITIESF:

DEC 9 1982

NAPOLITAN, B. J. PLANT ENG
GMC-FISHER BODY DIV FLEETWOOD PLT
WEEST FORT AND WEST END AVE
DETROIT MI 48209
FACILITY: WEST FORT AND WEST END
LOCATION: DETROIT MI 48209
ID NO.: MIT270012586

Dear Applicant:

RE: U.S. EPA Identification Number Change

This is to inform you that the United States Environmental Protection Agency (U.S. EPA) will be changing your temporary (T) identification number to a permanent (D) one. The label below shows your current temporary number as "OLD T NO." and the new permanent number as "NEW D NO."

OLD I.D. NO.: MIT270012586

NEW I.D. NO.: MID980700876

In order to provide your facility with adequate time to convert to the permanent U.S. EPA identification number, we will make the change in our computer system effective January 1, 1983. This will allow you to use your temporary identification number until the end of the calendar year and, thus, cover all 1982 hazardous waste handled under one number for your annual report.

We have coordinated the identification number change with your State hazardous waste management office. The State has a listing of your old and new numbers.

Please contact Mr. Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions regarding this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

cc: Facility owner



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

MAY 25 1902

B.J. Napolitan, Plt. Engr. GMC-Fisher Body Division Fleetwood Plant West Fort and West End Ave. Detroit, Michigan 48209

RE: Interim Status Acknowledgement

USEPA ID No. MIT270012586

FACILITY NAME: GMC-Fisher Body Division

Fleetwood Plant

Dear Mr. Napolitan:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

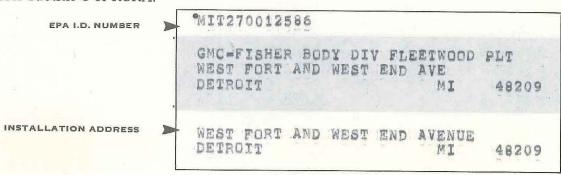
Waste Management Branch

Enclosure cc: C. Katko, General Manager 0

SEPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



EPA Form 8700-12B (4-80)

01/20/82

MAILED: DATE 128-82.

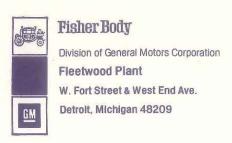
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GSA NO. 0246-EPA-DT

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specific industrial sources yo	our installation handles	. Use additional sheets	i necessary.	orrepagnioù en company en	<u> </u>
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X. CERTIFICATION		जी-संदर्भ का का			
I certify under penalty attached documents, and I believe that the submit mitting false information,	that based on my sed information is t	inquiry of those ind true, accurate, and co	ividuals immediate omplete. I am awa	ly responsible for obtai	ning the information. \mathbf{I}^{a}
SIGNATUAS -	. /	NAME & OFF	ICIAL TITLE (1784 6	r prini)	DATE SIGNED
Mulliman	\mathbf{n}	Plant	Manager	表演。 -	8.15.80

EPA Form \$700-12 (6-80) REVERSE



Waste Management Branch
US EPA Region V
111 W. Jackson Blvd.
Chicago, Illinois 60604

January 30, 1984

Attention: Mr. Karl J. Klepitsch, Jr.

5HW-13

Re: Withdrawal request for RCRA Part A application. GMC- Fisher Body Division-Fleetwood. US EPA I.D. No. MID 980700876 GTSD-PA

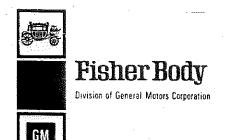
Fisher Body Fleetwood requested the withdrawal of their Part A Hazardous Waste Permit Application on July 6, 1983 (copy of July 6, 1983 letter enclosed). Your letter dated September 8, 1983 addressed to Mr. Katko requested further explanation. The enclosed form should satisfy your request. If you have any questions, please contact Mrs. Chris Bates at Fisher Body G.O., 313-575-5665.

Thomas E. Clifford Plant Manager

enclosure cc: B.J. Napolitan C. Bates

mlm/T.E.C.





General Offices

30001 Van Dyke Avenue Warren, Michigan 48090

October 3, 1983

Subject:

Delegation of Authority to Sign

Permit Applications under EPA

Permit Programs

From:

C. Katko

To:

T. E. Clifford

Fleetwood Plant Manager

MID 986 7008 76

As provided under 40 CFR 122.22, 144.32, 233.6 and 270.11 of the "Environmental Permit Regulations", the position of plant manager is hereby designated as my duly authorized representative for Fisher Body Fleetwood. As such, the plant manager is authorized to sign all permit applications, all reports required by permits, and other information requested by EPA or a corresponding state or municipal agency, submitted for the following programs:

- 1. National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act (40 CFR 122)
- Underground Injection Control Program of the Safe Drinking Water Act (40 CFR 144)
- 3. Dredge of Fill (404) Program of the Clean Water Act (40 CFR 233)
- 4. Hazardous Waste Permit Program of the Resource Conservation and Recovery Act (40 CFR 270)

In the absence of the individual occupying the designated position due to vacation, illness, or other reasons, the individual temporarily responsible for the operation of the facility or activity is my duly authorized representative.

C. Katko



GENERAL MOTORS CORPORATION

FLEETWOOD PLANT W. FORT STREET & WEST END AVE. DETROIT, MICHIGAN 48209

September 9, 1981

EPA Region 5 RCRA Activities P.O. Box A3587 Chicago, Illinois 60690

Attention: Computer Science Corporation

Dear Sir:

Your Mr. Scott Pretroucha stated during a telephone conversation on Wednesday, September 9, 1981, that you do not have a copy of Part A Notification Form (Form 8700-12) on file for the GMC-Fisher Body-Fleetwood Plant.

The following is, therefore, attached for your information:

U.S. EPA Notification of Hazardous Waste Activity (EPA Form 8700-12) dated 8-12-80.

and

Copy of letter dated November 1, 1980, sent to your Mr. Y.J. Kim requesting modification to our 8700-12 Form.

Please note that our original submission was well within the deadline specified by the regulations.

If you have any additional questions, you may contact the writer at (313) 554-7248.

Yours sincerely,

le Hoyd Gordon.

G. Lloyd Gordon Manufacturing Engineer

MIT270012586 WAS ASSIGNED TO

cc: B. J. Napolitan

G. E. Bessert

SEP 1 6 1981

REQUEST FOR CHANGE IN STATUS TO :

"GENERATOR ACCUMULATING WASTE ON-SITE IN COMPLIANCE WITH 40 CFR 262.34"

(APPLICABLE TO FACILITIES WHICH, AS OF NOVEMBER 19, 1980, HAVE BEEN STORING WASTES IN CONTAINERS AND/OR TANKS ONLY)

FACILITY NAME:

GMC - FISHER BODY DIVISION -

FACILITY LOCATION: West Fort St. and West End Ave.

MAILING ADDRESS:

Detroit, Michigan

48209

U.S. EPA ID NO.:

MID 980700876

I cerify, in reference to the above-name facility, that a complete and accurate description of the activities currently conducted, for purposes of the Resource Conservation and Recovery Act (RCRA), are those of a generator accumulating waste on-site in compliance with 40 CFR 262.34. This description of activities shall be considered effective as of July 6, 1983

(please type in above: today's date, or other

appropriate past date)

- 2. I certify that all hazardous waste which had been stored at this facility for greater than 90 days have been permanently removed and -- for that portion of the wastes that were present on-site on or after November 19. 1980 -- the manifest requirements of 40 CFR Part 262 have been complied with, and all manifests are on file at this facility, available for inspection by authorized State and Federal officials.
- I finally certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and al.] attachments and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature

Thomas E. Clifford Plant Manager

Type Name & Title

1-30-84

Date

(PLEASE HAVE APPROPRIATE OFFICIAL, PER 40 CFR 270.11 SINE AND DATE)



Waste Management Branch US EPA Region V 111 W. Jackson Blvd. 60604 Chicago, Illinois

January 30, 1984

Attention: Mr. Karl J. Klepitsch, Jr.

5HW-13

Re: Withdrawal request for RCRA Part A application. GMC- Fisher Body Division-

Fleetwood. US EPA I.D. No. MID 980700876 G. TSD-PA

Fisher Body Fleetwood requested the withdrawal of their Part A Hazardous Waste Permit Application on July 6, 1983 (copy of July 6, 1983 letter enclosed). Your letter dated September 8, 1983 addressed to Mr. Katko requested further explanation. The enclosed form should satisfy your request. If you have any questions, please contact Mrs. Chris Bates at Fisher Body G.O., 313-575-5665.

Thomas E. Plant Manager

enclosure

cc: B.J. Napolitan

C. Bates

NO ACTION TAKEN di chi vitrorawal

mlm/T.E.C.

APR 26 1984

Mr. Thomas E. Clifford
Plant Manager
Fisher Body
Division of General Motors Corp.
Fleetwood Plant
W. Fort Street and West End Avenue
Detroit, MI 48209

Re: Withdrawal of Part A (Storage Under 90 days)

Facility Name: GMC-Fisher Body Division-Fleetwood U.S. EPA ID No.: MID980700876

Dear Mr. Clifford:

This is to advise that your January 30, 1984, request for a change in status to that of a "generator accumulating waste on-site in compliance with 40 CFR 262.34", has been approved. For purposes of the Resource Conservation and Recovery Act (RCRA), you are now considered a "generator of hazardous waste". As a generator, you are subject to the regulations contained in 40 CFR Part 262, and any other applicable regulations referenced therein. Your facility is no longer considered a treatment, storage, or disposal (TSD) facility.

Should you decide in the future to initiate storage of hazardous waste for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application, within 30 days of such initiation.

Should you propose to initiate storage of hazardous waste in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A of your application is sufficient. Failure to resubmit a Part A application or to contact our office as mentioned above would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact David Homer, of my staff at (312) 886-6146, for assistance.

Sincerely yours,

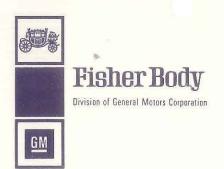
Karl J. Klepitsch, Jr., Chief Waste Management Branch cc: Mr. C. Kato Alan J. Howard, MDNR

5HW-13:DHHOMER:ap:6-6146:4-19-84

INITIALS DATE 14-19-84 4 20184 STU #1 STU #2 STU #3 CHIEF CH

MIT 270 012 586





General Offices 30001 Van Dyke Avenue Warren, Michigan 48090

July 6, 1983

Waste Management Branch US EPA Region V 111 W. Jackson Blvd. Chicago, IL 60604

Attention: Mr. Karl J. Klepitsch, Jr.

Re: Withdrawal Request for RCRA Part "A" Application GMC - Fisher Body Division - Fleetwood US EPA I.D. No. MID 980700876 74 6750 PAS 1

Gentlemen:

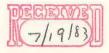
The hazardous waste management program at the Fisher Body Fleetwood Plant has been re-evaluated as a result of the US Environmental Protection Agency's commencement to process Part "B" Hazardous Waste Permit Applications for Treatment, Storage, and Disposal Facilities. Based on that re-evaluation, it has been determined that interim status for this site is not appropriate or required. The Fleetwood Plant is therefore requesting withdrawal of their Part "A" Application. The Plant will continue to operate as a generator only, and all hazardous waste will be handled in compliance with 40 CFR Part 262 for hazardous waste generators. Justification for this withdrawal request is outlined as follows:

Treatment

All treatment of hazardous wastes at this facility, as listed in the Part "A" Application, involve the waste water treatment plant and its associated sludge. These treatment activities are regulated by the Clean Water Act and were erroneously included on the Part "A" Application. There are no RCRA regulated treatment activities at this site.



WASTE MANAGEMENT BRANCH



Storage

The storage of hazardous wastes at this facility has always been conducted with a properly contained drum storage area with no risk of migration of hazardous wastes into the ground water or air. It is being assumed that interim status was affirmed by this facility since it cannot be verified that storage of hazardous waste did not exceed 90 days at any time during it's normal operation. However, all hazardous wastes previously stored at this site have been totally removed and procedures implemented to assure that all future hazardous wastes will be disposed of off-site in less than 90 days. Due to the nature of the storage containers, no site decontamination was necessary for facility closure.

Disposal

Subsequent to the passage of RCRA, no wastes of any type have been disposed of at this facility.

If you have any questions concerning the above Part "A" withdrawal request, please contact Mrs. Chris Bates at Fisher Body General Offices, 313-575-5665.

C. Katko

cc: J. Chu

W. Collinson

H. Elmquist

B. Napolitan

S. Kjader

General Motors Part: Division General Motors Corporation

Inter-Organization Letter

M 17 270 0/2 586

6- 750

See Below

Location

From Mr. J. W. Cagle Location

Subject Delegation of Authority to Sign

Reports Under EPA Consolidated

Date March 24, 1981

Permit Programs

TO: All Parts Plant Managers

All P.D.C. Managers

All Truck and Coach Managers

As required under Environmental Protection Agency Consolidated Permit Programs, Part 122, Section 122.6, the position of Plant Manager is hereby designated as my duly authorized representative for your facility. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the EPA Regional Administrator and/or the State/Local Program Director.

In the absence of the person occupying the designated position due to vacation, illness, or other reasons, the person temporarily responsible for the operation of the facility or activity is my duly authorized representative.

Any questions should be directed to the Environmental Control Group - Flint Central Office.

J. W. Cagle

General Manager

General Motors Warehousing and Distribution Division

JWC/vp

cc: <u>EPA Regional Administrator</u>

Plea e print or type in the unshaded areas only (fillin areas are spaced for elite type, i.e., 12 characters/inc	ch).			29:	Form Approved OMB No. 15	8-R0	175	MICHOS	
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NEPA .	Consolio	dated	Permits Pi		F M I D 0 0 5 3 5		711 20	6 3 D	
GENERAL (Read the	"Gener	al Ins	tructions"	before starting.)	GENERAL INSTRU		NS	3 14 15	
PA I.D. NUMBER	ation carefully; if any of it through it and enter the cappropriate fill—in area belothe preprinted data is absent							inform- t, cross in the any of	
V. MAILING ADDRESS PLEASE PL	ACE	LA	BEL IN	THIS SPACE	left of the label space list that should appear), please proper fill—in area(s) below complete and correct, you tems 1. III. V. and VI (e)	prov w. If need	infoide it the not co	mation in the label is emplete which	
VI. FACILITY LOCATION					must be completed regarditems if no label has been the instructions for detaitions and for the legal au which this data is collected.	provid led i	led. F tem	lefer to descrip-	
II. POLLUTANT CHARACTERISTICS	-						NY I		
INSTRUCTIONS: Complete A through J to determine questions, you must submit this form and the supplemental form is attached. If you answer "n is excluded from permit requirements; see Section C of t	ental fo	rm li ach q uctio	sted in the uestion, y ns. See also	e parenthesis following the quest ou need not submit any of thes	ition, Mark "X" in the box in t e forms. You may answer "no	the the " if you terms	our act	lumn tivity	
SPECIFIC QUESTIONS	YES	MAR	K'X' FORM ATTACHED	SPECIFIC Q	UESTIONS	YES	NO ,	FORM ATTACHE	
A. Is this facility a publicly owned treatment work which results in a discharge to waters of the U.S (FORM 2A)	.?	Х	18	B. Does or will this facility include a concentrated a aquatic animal productio discharge to waters of the	nimal feeding operation or facility which results in a	19	X 20	21	
C. Is this a facility which currently results in discharge to waters of the U.S. other than those described A or B above? (FORM 2C)		17 X	24	waters of the U.S.? (FOR)	will result in a discharge to M 2D)	25	X 26	27	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	of X	29	X		the lowermost stratum con- rter mile of the well bore,	31	X 32	33	
Do you or will you inject at this facility any produce water or other fluids which are brought to the surfact in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	ce o- of	X	36	cial processes such as mi	at this facility fluids for spe- ning of sulfur by the Frasch of minerals, in situ combus- overy of geothermal energy?	37	X 38	36	
Is this facility a proposed stationary source which one of the 28 industrial categories listed in the is structions and which will potentially emit 100 to per year of any air pollutant regulated under the Clean Air Act and may affect or be located in a attainment area? (FORM 5)	n- ns ne an	x		instructions and which w per year of any air pollute	d stationary source which is a strial categories listed in the will potentially emit 250 tons ant regulated under the Clean or be located in an attainment	43	X	45	
III. NAME OF FACILITY		41							
1 SKIP GMC-FISHER BOD	Y	D'I	'v'I's	ION-FLEET	WOODPLAN	T			
IV. FACILITY CONTACT						69			
A. NAME & TITLE (last,					PHONE (area code & no.)				
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B. COUNTY NAME WAYNE		Te		70					
C. CITY OR TOWN D. E. T. R. O. I. T.		1		D.STATE E. ZIP COL	1 (1) Rhowh)				
EPA Form 3510-1 (6-80)			T	08 19 1980		NUE	ON R	EVERS	

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VII. SIC CODES (4-digit, in order of priority)		B. SECONI	
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18 16 - 19 C. THIRD	15 16 - 19	D. FOURT	н
c (specify)	¢ 1 1 7	(specify)	
VIII. OPERATOR INFORMATION	15 16 - 19		
Α.	NAME		B. Is the name listed in Item VIII-A also the
	ISION-FLE	ETWOOD P1	LANT X YES NO
15 16			55 66
C. STATUS OF OPERATOR (Enter the appropriate letter) F = FEDERAL M = PUBLIC (other than federal or state) (specify)		PHONE (area code & no.)
S = STATE O = OTHER (specify) P = PRIVATE	P 56	A 3 .	1 3 5 5 4 7 2 4 7
E, STREET OR P.O. BOX	NDAVENIE		
WEST FORT AND WEST E	ND AVENUE	55	
F. CITY OR TOWN	G.STATE	Is the facili	ity located on Indian lands?
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x, EXISTING ENVIRONMENTAL PERMITS	40 41 42	47 - 51	
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	A	30	
B. UIC (Underground Injection of Fluids)	E. OTHER (specify)		
9 U N A 9 B	3 3 6 7	(specify) State Air	Permits
C. RCRA (Hazardous Wastes)	E. OTHER (specify)	(an aciful	
9 R N A 9 9 15 15 17 18 - 30 15 16 17 1		(specify)	
XI. MAP			
Attach to this application a topographic map of the area the outline of the facility, the location of each of its ex			
treatment, storage, or disposal facilities, and each well water bodies in the map area. See instructions for precise	vhere it injects fluids under	ground. Include all sprin	
XII. NATURE OF BUSINESS (provide a brief description)	requirements. Pg A	150	
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XIII. CERTIFICATION (see instructions)			
I certify under penalty of law that I have personally exa attachments and that, based on my inquiry of those papplication, I believe that the information is true, accurately false information, including the possibility of fine and improve	ersons immediately respon ate and complete. I am aw	sible for obtaining the in	formation contained in the
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	0	C. DATE SIGNED
C. Katko, General Manager	(Katt	to	11-18-80
COMMENTS FOR OFFICIAL USE ONLY	() - ()		
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15 16 EPA Form 3510-1 (6-80) REVERSE			557
1980 communición de Revenies	RT ARK		

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NOTE: Photocopy Sis page before completing if ye ive more than 26 wastes to list. Form Approved OMB No. 158-S80004 FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) W DUP DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA-SURE (enter code) D. PROCESSES A. EPA HAZARD. WASTE NO B. ESTIMATED ANNUAL QUANTITY OF WASTE ZO. 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (enter code) s 9 1 3e41,000 |g|1F Ø P 126 ØØØ 2 Ø F Ø S Ø 1 T 3 ø ø S Ø 2 T Ø 4 352 666 6 F T included with above 5 ø 93 Ø Ø Ø ø $s \not o 1$ F 8 Т 5 0 0 p 6 Ø Ø 9 S Ø 2 T Ø 1 F T 8 32 600 s Ø 1 9 D 0 0 1 Т s Ø 1 12,159 ø ø 10 D 2 P 525 ppp T Ø 1 1 2 3 U P 13 14 15 16 17 18 19 20 21 22 23 25 26

Continued from the front.				PROSECULAR CONTRACTOR
IV. DESCRIPTION OF HAZARDOUS WAST	'continued)			and the second second
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5 U.T. A.C. [enter from page 1]				
F M + 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
V. FACILITY DRAWING				
All existing facilities must include in the space provide	ed on page 5 a scale drawing of the f	iacility (see instructions	for more detail), 🕂 🚷	H 133
VI. PHOTOGRAPHS	Assessed Assessment of Constitution			
All existing facilities must include photographs treatment and disposal areas; and sites of future	gaerial or ground—level) that c e storage, treatment or disposal	areas <i>(see instructio</i>	ns for more detail).	FB A136
VII. FACILITY GEOGRAPHIC LOCATION		orazak elaparen	and the second second second	
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VIII. FACILITY OWNER	n	72 -	74 75 76 77 - 7	∃
▼ A. If the facility owner is also the facility operat	as a listed to Costine VIII on Form	1 "General Information	yn" place an "Y" in the	boy to the left and
skip to Section IX below.	or as fisted in Section VIII on Form	i i, General miorinetic	, place and A in the	
B. If the facility owner is not the facility operat	or as listed in Section VIII on Form	1 complete the follow	rīng items:	
				E NO. (area code & no.)
	FACILITY'S LEGAL OWNER			
E			55 56 - 53	59 - 61 62 - 65
3. STREET OR P.O. BOX	4. CI	TY OR TOWN	5.ST.	6. ZIP CODE
	$\overline{\mathbf{G}}$			
15 16	45 15 16		40 A1 47	7 - 51
IX. OWNER CERTIFICATION			n submitted in this s	nd all attached
I certify under penalty of law that I have perso documents, and that based on my inquiry of th	nany examineo ano am ramina iose individuals immediately res	sponsible for obtainii	ng the information, I	believe that the
submitted information is true, accurate, and co	mplete. I am aware that there a	are significant penalti	es for submitting fals	e information,
including the possibility of fine and imprisonm	ent.			
A. NAME (print or type)	B. SIGNATURE	2//	C. DATE SIG	
C. Katko, General Manager	Kal	Zo-	11-18	1-D
X, OPERATOR CERTIFICATION				
			on cubmitted in this s	and all attached
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- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE CODI	E
POUNDS.		KILOGRAMSK	
TONS		METRIC TONS	ŵ

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code/s/.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
"included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Zo	A. EPA HAZARD. WASTENO (enter code)		C. UNIT OF MEA SURE (enter code)	^-	- 13 V. 3 V. 3		1. PROCESS (ente			D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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X-2	D 0 0 2	400	P		T ())	3 D 8 0		1 1	
X-3	$D \mid O \mid O \mid I$	100	P		$T^{\dagger} \ell$	۱ د (3 D 8 0	1 1		
X-4	D0002					T .		A) (17) (17) (17) (17) (17) (17)		included with above

Continued from page 2. NOTE: Photocopy this page before completing in have more than 26 wastes to list, Form Approved OMB No. 158-S80004 FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) MID 0 5 3 5 6 7 4 6 3 1 W 2 DESCRIPTION OF HAZARDOUS WASTES (continued) DUP C. UNIT OF MEA-SURE (enter code) D. PROCESSES HAZARD. WASTENO (enter code) B. ESTIMATED ANNUAL QUANTITY OF WASTE LINE NO. 36 s 9'1 3,41,0000 F Ø 0 1 P 126000 0 5 Ø F T S 0 1 Ø 352 666 S Ø 2 3 Ø T Ø 4 F 6 T 18 included with above 5 Ø 8 93000 d S 0 1 F T 6 F Ø Ø 9 5000 T S Ø 2 T Ø 1 687000 F 0 1 T Ø 1 T Ø 4 T 8 9 D 9 9 32 000 T S 0 1 1 10 DØØ 2 S Ø 1 12,159 P 11 2 525 ppp S 0 2 U 1 3 T Ø 1 P 13 14 15 16 17 18 19 20 21 22 23 25 26 EPA Form 3510-3 (6-80) CONTINUE ON REVERSE PAGE 3_ OF 5

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E. USE THIS SPACE TO LIST ADDITIONAL PRO		E 3.	

•			
W7 = 0 = 1/4 = 5 = 1			
MIT27 00 12586 EPA I.D. NO. (enter from page 1)			
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FACILITY DRAWING		Company of the Compan	
existing facilities must include in the space provided on PHOTOGRAPHS	page 5 a scale drawing of the facility (see instruc	tions for more detail). 🗜 🥻	6 A 155
Il existing facilities must include photographs (aeri	ial or ground-level) that clearly delineate a	all existing structures; exi	isting storage,
	ial or ground—level) that clearly delineate a rage, treatment or disposal areas (see instru	Ill existing structures; exictions for more detail).	F6 A/56
II. FACILITY GEOGRAPHIC LOCATION			
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LATITUDE (degrees, minutes, & seconds 42 1 7 5 6 6 6 6 6 6 6 7 6 7 6 8 6 6 6 7 6 7 6 8 6 7 6 8 7 6 8 7 7 7 7	listed in Section VIII on Form 1, "General Informisted in Section VIII on Form 1, complete the following the following state of the follo	mation", place an "X" in the bollowing items: 2. PHON 55 56 - 58 5. ST. 40 41 42 C. DARE SIG	e box to the left and HE NO. (area code & n 59 - 61 62 - 6. ZIP CODE and all attached believe that the se information,
I. FACILITY GEOGRAPHIC LOCATION LATITUDE (degrees, minutes, & seconds 42 1 7 5 65 66 67 65 65 67 65 65 65 67 65 65 67 67 67 67 67 67 67 67 67 67 67 67 67	listed in Section VIII on Form 1, "General Informisted in Section VIII on Form 1, complete the following the section VIII on Form 1, complete the following the	mation", place an "X" in the ollowing items: 2. PHON 55 56 - 58 5. ST. 40 41 42 C. DARE SIGNATURE SIG	be box to the left and HE NO. (area code & note to be lieve that the se information, GNED and all attached believe that the se information,
III. FACILITY OWNER III. FACILITY OWNER A. If the facility owner is also the facility operator as skip to Section IX below. B. If the facility owner is not the facility operator as in the facilit	listed in Section VIII on Form 1, "General Informisted in Section VIII on Form 1, complete the following the section VIII on Form 1, complete the following the	mation", place an "X" in the ollowing items: 2. PHON 55 56 - 58 5. ST. 40 41 42 C. DARE SIGNATURE SIG	e box to the left and TE NO. (area code & n 159 - 61 52 6. ZIP CODE and all attached believe that the se information, GNED and all attached believe that the se information,

TTT	PD	OC	FCC	EC/	man:	tinued	0
A.R.A.	T. F.	W.	EDD	E CO	C (111)	11111111111	1

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

TO4 - 6,000 Gallons/ day WASTEWATER TREATMENT SLUDGE DEWATERING

THE PERSON NAMED IN COLUMN 2 IS NOT

- IV. DESCRIPTION OF HAZARDOUS WASTES

 A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis, For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDS	KILOGRAMSK
TONS	METRIC TONS, , ,

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

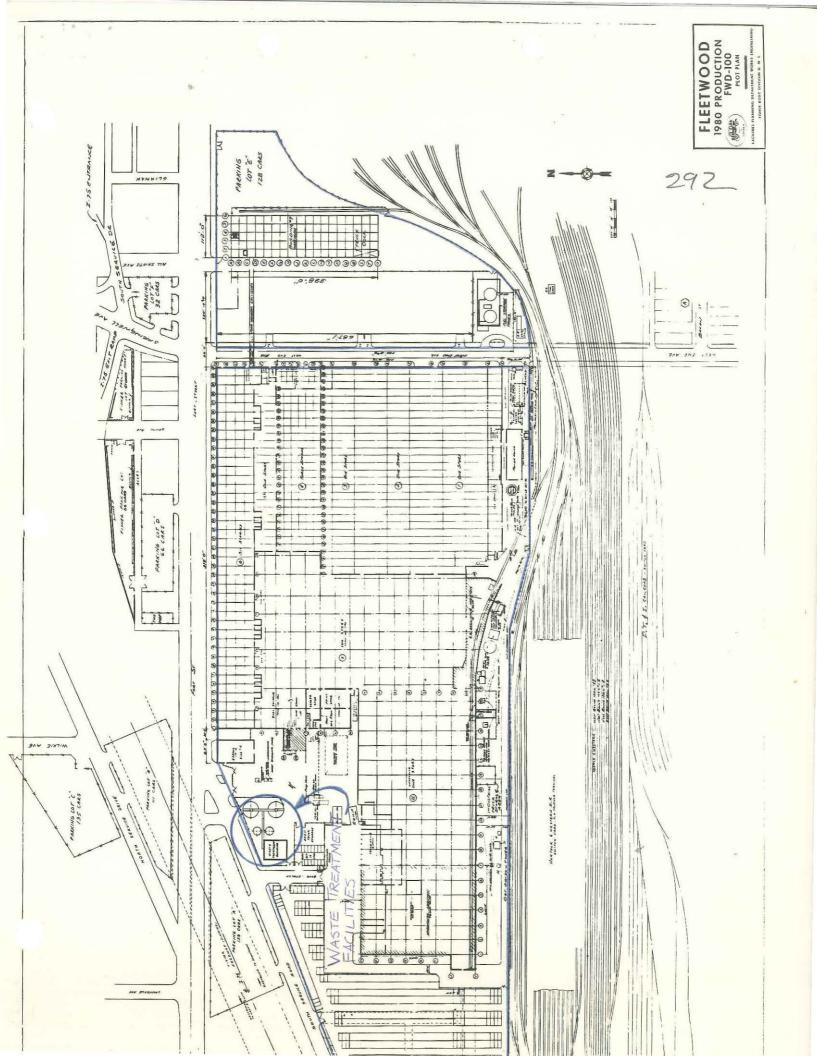
2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

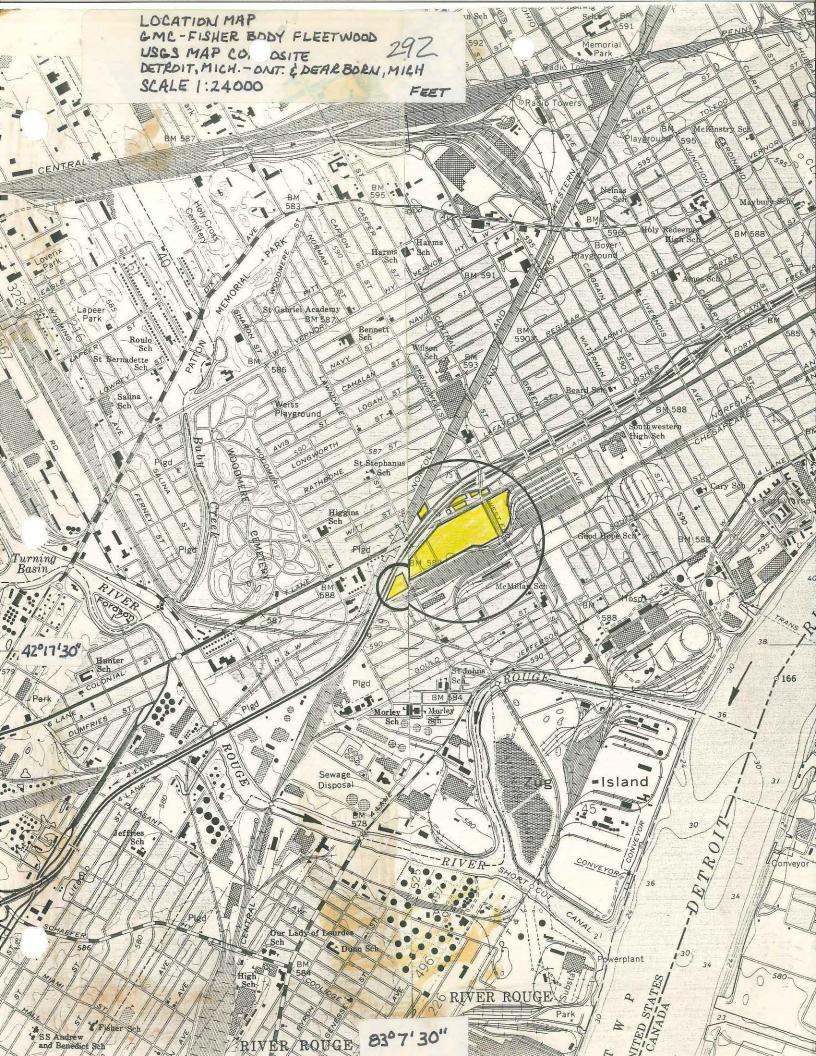
EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of that waste. Treatment will be an estimated 100 pounds per year of the year of year

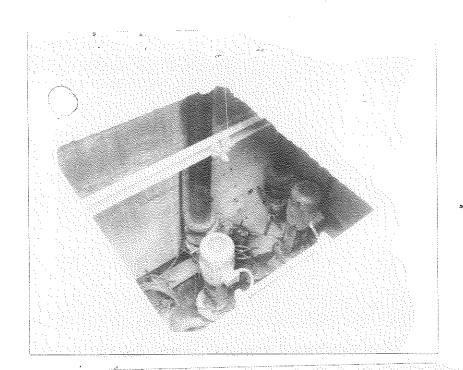
		A	. E	PA				UNIT									D. PROCESSES
LINE	W	VA	ST	EN	10	B. ESTIMATED ANNUAL QUANTITY OF WASTE	S	MEA- URE inter ode)				1, 1	RC		ss con ter)	ES	2. PROCESS DESCRIPTION (if a code is not entered in $D(1)$)
X-1		K	0	5	4	900		P	T	0	3	D	8	0			The White Control
X-2	2 1	D	0	0	2	400		P	T	0	3	D	8	0			side the state
X-:	3 1	D	0	0	1	100		P	T	0	3	D	8	0			which the second
X-4	1	D	0	0	2												included with above

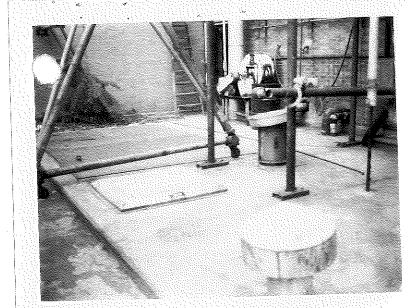


V. FACILITY DRAWING (see page 4)

2912









SLUDGE STORAGE TANK

10-14-80

BLAZE J. NAPOLITAN,
PLANT ENGINEER
FISHER BODY-FLEETWOOD

SLUDGE STORAGE TANK

10-14-80

BLAZE J. NAPOLITAN,

PLANT ENGINEER

FISHER BODY-FLEETWOOD

WASTE WATER TREATMENT
FACILITIES

10-14-80

BLAZE J. NAPOLITAN, PLANT ENG.

FISHER BODY FLEET WOOD PLANT

GENERAL MOTORS CORPORATION

FLEETWOOD PLANT
W. FORT STREET & WEST END AVE.
DETROIT, MICHIGAN 48209

November 1, 1980

Y. J. Kim
EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, IL 60680

Re: Notification of Hazardous Waste Activity for Fisher Body Division - GMC - Fleetwood Plant W. Fort St. & W. End Ave EPA ID No. MID005356746

Dear Sir:

Subsequent to our submission to your office of EPA Form 8700-12 on August 15, 1980, it has come to our attention that certain information was inadvertently omitted from our Notification of Hazardous Waste Activity.

Pursuant to advice General Motors received from EPA personnel in Washington, we are requesting that the EPA Form 8700-12 submitted for the facility identified above be modified to reflect the hazardous waste activities shown below. Please note that this facility has been assigned an EPA identification number.

The following information was inadvertently omitted:

Part IX. A. Hazardous Wastes from Non-Specific Sources - No. F005 and No. F018

Please incorporate this additional information on EPA Form 8700-12 for this facility. If you have any questions, please contact B.J. Napolitan at (313) 554-7247.

L. D. Richards Plant Manager Tear out here

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983. Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS	
Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983	1 Non-handler
calendar year. Circle the one code at right that best describe	s 2 Small Quantity Generator
your status during the entire year (see instructions for explanation of codes).	4 Exempt
explanation of codes).	5 Beneficial Use 9 Closed
	9 Closed
Discourage of the state of the	This is a superior of the supe
Please print/type with elite type (12 characters per inch)	This Installation's Non-Regulated Status is Expected to Apply:
II. GENERATOR'S EPA I.D. NUMBER	☐ For 1983 Only ☐ Permanently
T/A C	☐ Other
[FM 1 D 9 8 0 7 0 0 8 7 6 1	U Other
	C303 ENTRY (OFFICIAL USE ONLY):
III. NAME OF INSTALLATION	COOPERING (OFFIGIAL OSE ONET).
III. WAITE OF INSTALLATION	
IGMC IFITISHER BODY FLEET	W 0 0 D
IV. INSTALLATION MAILING ADDRESS	
District Palate Ide Ide Mickey	Esta Labrel I I
15 16	END AVE 1
Street or P.O. Box	
4 DETROIT	1 MI 4-8 2 0 9
15 16 City or Town	41 42 47 51 State Zip Code
V. LOCATION OF INSTALLATION (if different than section	IV above)
[5]	
15 16	45
Street or Route number	
[6]	41 42 47 51
City or Town	State Zip Code
VI. INSTALLATION CONTACT	
EN V.A. LOSSO SIAMONDO	
2 KAJDER SANDRA	45
Name (last and first)	
3113-1554-17121481	<i>*</i>
46 55 Phone No. (area code & no.)	
VII. CERTIFICATION	
I certify under penalty of law that I have personally examined and am famili documents, and that based on my inquiry of those individuals immediately	
submitted information is true, accurate, and complete. I am aware that there	

Signature of Authorized Representative Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Print/Type Name

including the possibility of fine and imprisonment.

Page 1 of 6

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

VIII. GENERATOR'S EPA I.D. NO. T/A C GMI D980700876 11 1 2 XI. FACILITY'S EPA I.D. NO. X. FACILITY'S EPA I.D. NO. WOODLAND MEADOWS XI. FACILITY ADDRESS 4620 HANNAN RO.	Date rec'd: Rec'd by:	IX. FACILITY NAME (specify facility to which all wastes or
XI. FACILITY ADDRESS X. FACILITY'S EPA I.D. NO. XI. FACILITY ADDRESS 4620 HANNAN Ro.	T/A C	
	X. FACILITY'S EPA I.D. NO.	XI. FACILITY ADDRESS

XII. TRANSPORTATION SERVICES USED

WASTE MANAGEMENT OF MICHIGAN /WEST

MID 07290546

·- ·· · · · · · · · · · · · · · · · · ·	# 6	TE IDENTIFICATION	B. DOT Hazard			EPA H Waste	azard	ous	The Society		en es	Park Control		ta de la composição de la		E. Unit of Measure
Sequence #	Ē		8. Ha	3		e inst	ructio	ns)	_ []). Aı	mou	ınt o	f W	aste		F. (Me
	1	HAZARDOUS WASTE SOLID N.O.S.	1,5	35		0 6 38	39	42			1	ء ا	2,4	40	0	
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XIV. COMMENTS (enter information by section number-see instructions)

* AVERAGE DENSITY = 1.3g/ml.

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd:	Rec'd by:			ME (specify facility to which all wa	
VIII. GENERATOR	'S EPA I.D. NO.	:		DISPOSAL, INC.	
GM1 D191810	17 0 0 6 7 6 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1				
	and the second of the second o		XI. FACILITY AD	DDRESS N. Service Dr.	
X. FACILITY'S EPA				LE, MI 48111	
15M1100148	090633			<i>y</i>	
	া প্রতিষ্ঠান করিছে । বিষয়েকীয়ার বিষয়েকীয়ার				
XII. TRANSPORTA	TION SERVICES USED			,	

MANAGEMENT OF MICHIGAN/WEST
MID 07290546

,			
XIII. WAS	TE IDENTIFICATION		e o
Sequence #	A. Description of Waste	B. DOT Hazard	C. EPA Hazardous Waste No. See instructions) C. EPA Hazardous D. Amount of Waste
29 32	HAZARDOUS WASTE SOLID.	<i>I</i> ₁ 5 33 34	5 35 38 39 42 4 4 4 4 4 4 8 P 34 43 46 47 50 51 59 60
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XIV. COMMENTS (enter information by section number-see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec	'd:	Rec'd by:	
VIII. GE	NERATOR'S I	EPA I.D. NO.	
GM1	D 9 8 0 7	10101817161 11 13 14 15	
X. FACI	LITY'S EPA I.	D. NO.	. 40.00
 FM 1	00609	17151814141 28	

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEMICAL RECOVERY SYSTEMS, INC.

XI. FACILITY ADDRESS

36345 VAN BOEN RO.

ROMULUS, MI 48174

XII. TRANSPORTATION SERVICES USED

CHEMICAL RECOVERY SYSTEMS, INC.
MID 060975844

; XIII. WA	STE IDENTIFICATION		C. EPA Hazardous
Sequence #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions) C. EPA Hazardous D. Amount of Waste
29 32	PURGE THINNER AND LACQUER MIXTURE FROM PAINT SPIRAY OPERATIONS	0/8 33 34	FOOS
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XIV. COMMENTS (enter information by section number—see instructions)

* DENSITY = . 91 g/ml

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

	Date rec'd:Rec'd by:		IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)								
	VIII. GENERATOR'S EPA I.D. NO.		CHEM-MET SERVICES								
	GM 10980700876 11										
	and the second of the second o		XI. FACILITY ADDRESS								
	X. FACILITY'S EPA I.D. NO.		18550 ALLEN RD. WYANDOTTE, MI 4-8192								
	FM 10096963194		in adjustice of the second								
	XII. TRANSPORTATION SERVICES USED CHEM-MET SERVICES MID 096 BENTLEY DIL, INC. MID 0007186 K+D INDUSTRIAL SERVICES, IN	50									
	XIII. WASTE IDENTIFICATION	10 mg	o o								
Ser	quence # A. Description of Waste	B. DOI Hazard code	C. EPA Hazardous Waste No. (see instructions) C. EPA Hazardous Waste No. D. Amount of Waste								
	WASTE PAINT, NOS	-	D ₁ O ₁ O ₁ /								
<u> </u>	2 WASTE COMPOUND THINNING, NOS	0.8	0001								
L	3 WASTE XYLENE	08	F0 0 3								
. 1	4 WASTE OIL, NOS	01	D101011								
1	5 WASTE CLEANING COMPOUND NOS	02	DIOIOIZ								
	6 WASTE CEMENTS + ADHESIVES	0.2	D101011 1 1								
_	7 WASTE SOLVENTS	0.8	D ₁ O ₁ O ₁ /								
_	8 WASTE FUEL OIL, DIESEL &Z	0,1	DO:011 1 1 1 2 0 0 6								
L.	9 WASTE GASOLINE	08	D101011								
-	10 WASTE DICHLOROMETHANE +		Daoil								
L	11 HAZARDOUS WASTE SOLID NOS	15	F101016								
L	12		111111111111111111111111111111111111111								
_											
	XIV. COMMENTS (enter information by section number—see	instruc	T. ANG DENSITY = 6.5 LDS/GAL								
	III 1. AVG. DENSITY = 9 LBS/GAL										
	2. " : 8 LBS / GAL		8								
	3. " - 7 LBS /GAL		V. 110								
	4 = 8 LBS/6AL		" - a a rachar								
	= 9.5LBS/6AL		11								

= 8 LBS/GAL

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

IX. FACILITY NAME (specify facility to which all wastes or this page were shipped)
MICHIGAN DISPOSAL, INC.
では、これでは、これでは、これでは、これでは、これでは、これでは、これでは、これ
XI. FACILITY ADDRESS
49350 N. SERVICE DR.
BELLEVILLE, MI 48111

WASTE MANAGEMENT OF MICHIGAN /WEST, MID 072790546
GREAT LAKES WATER BLASTING, INC. MID 087484556

XIII. WAS	TE IDENTIFICATION	L P		±249	C. EPA I	lazardous	دراهید (بد ا			A Description of the Con-	ait of ure
Sequence #	A. Description of Waste	☐ X → Waste No.				te No. tructions)		Waste	E. Unit of Measure		
L 1 1 29 32	HAZARDOUS WASTE SOLID,	33	~		38 1	1 1 1 1			1 3 18	950	عد
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9											·····
10			-					<u> </u>	<u> </u>		
11									1		
12											

XIV. COMMENTS (enter information by section number-see instructions)

* DENSITY = APPROX. 1.1 gram/ml

C.2 Compliance/ Enforcement 4-26-83 4-26-83

STATE OF MICHIGAN

1479

VATURAL RESOURCES COMMISSION

JACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELL
PAUL H. WENDLER
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909
HOWARD A. TANNER, Director
Hazardous Waste Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

March 15, 1983

Mr. G. Lloyd Gordon
Manufacturing Engineer
GMC-Fisher Body Fleetwood Plant
West Fort SI/West End Avenue
Detroit, Michigan 48209

Re: MIT 270012586

Dear Mr. Gordon:

On March 9, 1983, the Fleetwood Plant was inspected to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. The facility generates and stores hazardous waste and is subject to the Act.

No violations of RCRA were found during the inspection.

Thank you for your cooperation. Feel free to contact me at (313) 675-0860 if you have any questions.

Sincerely,

William E. Stone

Water Quality Specialist

William E. Stow

Compliance Section

Hazardous Waste Division

WES/sc

cc: Ken Burda (3)

Hazardous Waste Inspection

GMC-Fisher Body Division-Fleetwood Plant West Fort and West End Avenue Detroit, Michigan 48209

MIT 270012586

The plant is an automobile body assembly operation. No off site waste is accepted.

Most of the waste generated (90%) is ignitable ($\underline{D001}$) paint sludge and thinner. It is accumulated in drums in the plant, transferred to the outside curbed concrete HWMF and the drums are transported to Chem-Met by K & D Industry before 90 days has elapsed.

Another major waste is the sludge from the wastewater treatment plant. Since the plating rinse waters are discharged to the treatment plant, the company is managing the sludge as <u>F006</u> waste. They are preparing a delisting petition for the sludge since it and the wastewater do not exhibit the characteristics for which F006 was listed or any other hazardous characteristics. The sludge after removal from the treatment tank is dewatered (filter press) and transported to Wayne Disposal by Waste Management.

They occasionally generate D006 and D002 waste and could potentially generate a large number of other characteristic and U and P list wastes. Generally these are placed in drums, accumulated in the HWMF and disposed of at Chem-Met.

The facility has status as a storage facility but it was indicated that no waste has been accumulated beyond 90 days since 10/1980.

The assembly operations are scheduled to transfer to the Plant under construction in Detroit within two years.

4 4. 26.00

RCRA Inspection Report

EPA Identification Number: $M I 7$	270010	2586 (MED 665		
Installation Name: GMC- Fishe		•		
Location Address: West Fout as	nd West End Ave	-		
City: Detroit	State: Mi 48.	209		
Date of inspection: $3/9/83$	Time of inspection (from)	1:30p (to) 3:30p		
Person(s) interviewed	Title	Tel ephone		
G. Lloyd Bordon	Manufacturing Eng.	313)554-7248		
Inspector(s)	Agency/Title	Tel ephone		
William E. Stone	M. DWR-HWO/WAS	313)675-0860		
Installation Activity (mark only one	box)	<pre>Inspection Form(s)</pre>		
Treatment/Storage/Disposal per 40 Generation and/or Transportation	CFR 265.1 and/or	A		
	neration or Transportation)	A		
☐ Generation and Transportation		B, C		
☐ Generation only		8		
T Transportation only				

CC: Ken Burda (3)

SCOPE OF INSPECTION. Section A:

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>P</u> €	ermit application	n process(es) (EPA Form 3510-3) II	nspection Form	A section(s)
	501 📈	storage in containers		I .
	S02 <u> </u>	storage in tanks		J
	то1 🔟	treatment in tanks		J
	S04 <u> </u>	storage in surface impoundment		K,F
	Т02 🔟	treatment in surface impoundment		K,F
	D83	disposal in surface impoundment	-	K,F
	S03 <u> </u>	storage in waste pile		Ľ
	D81	disposal by land application	-	M,F
	D80 <u> </u>	disposal in landfill	•	N,F
	Т03 🎞	treatment by incineration		0/P
	T04 🎞	treatment in devices other than ta impoundments, or incinerators	inks, surface	Q
<u>Other</u>	activities			
	GENERATOR X		APPENDIX	GN
	TRANSPORTER		APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

noul

cc: Kan Burda (3) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion. fine 3-To1- This is treatment in a tank w/ discharge to was a POTW, meets wastewater Treatment Unit" exclusion.

The wastewater is not hazardous and the studge although listed (FOOG) boes not exhibit the characteristics A-1 for which it was listed. (4-82A)

The company is therefore preparing a delisting petition for FOOG. If approved

			Section B:	GENERAL FACIL	ITY STAN	DARDS:	(Part	265 Subpart B)
					YES	NO	NI*	Remarks
	Has been	the Regio	onal Adminis i regarding:	trator 265.12				
			of hazardous om a foreigr			ayseers.wes	ALLESS SAN FORMATION AND ASSESSMENT OF THE SAN FRANCE OF THE SAN F	NA
	b.	Facility	expansion?		-			WA
	C•	Change of	f owner or (perator?		*********		NA
2.	Gene	ral Wast	e Analysis:	265.13				
	a.	a detail		erator obtained and physical te?	d <u>X</u>			
	b.	a detail	owner or o ed waste an at the faci		<u>X</u>	est000000bb00b		
	C.	specify and anal		for inspection h movement of	***************************************			NA
3.	Sec	urity - D (if a	o security applicable)	measures inclu 265.14	de:			*
s .	ā.		surveillanc	e?	X		*****	
	b.	i. Artif barri	or ficial or na ier around f		<u>X</u>		*************	
			nd rolled entry	?	<u> </u>			
	c.	Danger s	sign(s) at e?		難		<u>X</u>	
4.	Own	er or ope	erator inspe	ections: 265.1	5			
	a.	inspect malfunc operato of haza may aff	e owner or or the facilitions, determined to the contract of t	ty for rioration, nd dischanges that		-		

		y	U	U	•	C	ıe	:5	C	Г	ı	р	C	1	O	П	Ş	:

265,16

Job titles?

include:

			YES	NO	N1	Kemark	\$		•
	· C.	Description of training?	X	 		workstoon of the state of the s			5-111-1-150-7-1-1D
	q.	Records of training?	X				. · ·		
	e.	Did facility personnel receive the required training by 5-19-81?	4	**ONTO CONTAINS	simon		4500X1F2007		
	f.	Do new personnel receive required training within six months?		40000	$\underline{\underline{\mathcal{X}}}$				
	g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	×	S,	·hedule	9/ Lfor	l82 10 6/83	ist rever	W
6.	re	required, are the following special quirements for ignitable, reactive, incompatible wastes addressed? 265.	17						•
	a.	Special handling?	<u>×</u>	,	***************************************		• <u></u>		
-	b.	No smoking signs?			X				
1	C.	Separation and protection from ignition sources?	<u>X</u>	p #850M3-445M-400		_			

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1.	Maintenance and Operation of Facility: 265.31	YES NO	NI	Remarks	
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	_ X	11.5	Remarks	
2.	If required, does the facility have the following equipment: 265.32			•	
	a. Internal communications or alarm systems?	<u> </u>		\$\tag{\text{\text{\$\sigma}\tex	-
	b. Telephone or 2-way radios at the scene of operations?	<u>×</u> _			·
÷	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u>X</u> _			
	Indicate the volume of water and/or foam	m available	for	fire control:	
A TOTAL OF THE PROPERTY OF THE	250,000 and 75,000	o tanks	<u>as</u>	back up to	Municipal
3.	Testing and Maintenance of Emergency Equipment: 265.33	-			
	established testing and maintenance procedures for emergency equipment?	<u>×</u> _	*COLUMN		
	b. Is emergency equipment maintained in operable condition?	<u>×</u>			
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	<u>X</u> _	. 	· · · · · · · · · · · · · · · · · · ·	
5.	Is there adequate aisle space for unobstructed movement?	<u>X</u> _			
6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?				

- Does the Contingency Plan contain the following information: 265.52
 - a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

 Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

2		
	 TONO-170-170	 _

x excellent

X

X

			YES NO	NI	Remarks	
3.	Eme	rgency Coordinator 265.55		· .		
	g.	Is the facility Emergency Coordinator identified?	X			
	þ.	Is coordinator familiar with all aspects of site operation and emergency procedures?	X_			
	C*	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	2	400-yy		
4.	Eme	ergency Procedures 265.56				
	at -Cod	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occurred listed in 265.56?		-	NA	

				ORIING: (Part 265 Subpart E)
•		YES NO	NI	Remarks
Use	of Manifest System 265.71			
a.	Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)		-	
b.	Are records of past shipments retained for 3 years?	distillational following	W-C	
reg	wirements regarding manifest			
on-s	ite facilities that do not			
0pe	rating Record 265.73			1
a.	Does the owner or operator maintain an operating record as required in 265.73?-	<u>X</u>	essourmentum.	-
b.	Does the operating record contain the following information: i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<u>×</u> _	***************************************	manifests
	ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	<u>×</u> _	· · · · · · · · · · · · · · · · · · ·	inspection log - # drum
***i	iii. A map or diagram of each cell or disposal area			
	b. Doe regards apponesseive Ope a. b.	a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.) b. Are records of past shipments retained for 3 years? Does the owner or operator meet requirements regarding manifest discrepancies? 265.72 applicable to owners or operators on-site facilities that do not eive any waste from off-site sources. Operating Record 265.73 a. Does the owner or operator maintain an operating record as required in 265.73? b. Does the operating record contain the following information: i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I? ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.) ***iii. A map or diagram of each	a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.) b. Are records of past shipments retained for 3 years? Does the owner or operator meet requirements regarding manifest discrepancies? 265.72 applicable to owners or operators on-site facilities that do not eive any waste from off-site sources. Operating Record 265.73 a. Does the owner or operator maintain an operating record as required in 265.73? b. Does the operating record contain the following information: i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix 1? ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.) ***iii. A map or diagram of each	a. Does the facility follow the procedures listed in \$265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.) b. Are records of past shipments retained for 3 years? Does the owner or operator meet requirements regarding manifest discrepancies? 265.72 applicable to owners or operators on-site facilities that do not eive any waste from off-site sources. Operating Record 265.73 a. Does the owner or operator maintain an operating record as required in 265.73? b. Does the operating record contain the following information: i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix 1? ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.) ***iii. A map or diagram of each

4/82-A

*** only applies to disposal facilities

YES NO

NI

Remarks

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	ė		YES	NO	NI	Remarks	44 5	*
1.	faci	the owner or operator of the lity implemented a ground-ronitoring system? 265.90		- -		***		
	If "	no", Skip to number 11.						
2.	faci grou	the owner or operator of the lity implemented an alternate indwater monitoring system as ribed in 265.90(d)?	-	· /		AMPRIMED TO THE WHOLE THE SET OF THE	der med diese van die Ern well er die beloe van van	
	If " If "	yes", skip to number 12. no", continue		-				4
3.	syst	the groundwater monitoring tem meet the following re- rements of 265.91:		•				
	ā.	At least one well installed hydraulically up-gradient from the limit of the waste management area?	-				27610	-
	,	Indicate the total number of up-gradient wells.				_	, -	
	b.	At least three wells installed hydraulically down-gradient at the limit of the waste management area?	*****************	WATER-STATE	· Williams			
•		Indicate the total number of downgradient wells.	-	• :	-			
	c./	Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?						

Sketch the locations of the wells relative to the waste management area.

			YES	NO	M	Remarks	,
	d.	Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?		_			
4.	deve wate pla	the owner or operator eloped a written ground- er sampling and analysis n that includes procedures techniques for: 265.92			-		
	a.	Sample collection?	_		_	M	
	b.	Sample preservation and shipment?		***************************************	- -		1010101-01111111-00111111
	C.	Analytical procedures?		-			
:	ď٠	Chain of custody control?			Accounts	DOTAL .	
5.	fol	s the owner or operator low his groundwater sampling analysis plan?	f	- Programs	***************************************	entropy sion to the second	
6.	ana	the groundwater sampling and lysis plan maintained at the iljty?	**************************************		-	· .	
7.	min of par anc	the owner or operator deter- ed the concentration or value all the groundwater monitoring ameters of 265.92(b) in accord- e with paragraphs c and d of .92?					÷1005

YES NO

ΝÏ

Remarks

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

Skip questions 12, 13, and 14.

•		YES	NO	NI	Remarks	
12.	Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?		<u> </u>			
	a. Has the plan been certified by a qualified geologist or geotechnical engineer?			,		MODERNOON FOR SECURITY OF THE
	: If the plan for an alternate groun he Regional Administrator the inspect					
13.	Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	Web Do Adderson		***************************************		
14.	Does the owner or operator submit reports and maintain records as required in 265.94?	-				

	Section & CLUSURE AND PO	DSI CLUSURE (Pari	t >> Subpart G)
		YES NO NI	Remarks
. Clos	sure 265.112		
- 3 -	Is the facility closure plan available for inspection?	<u> </u>	
b.	Does the plan identify:		
	i. maximum extent unclosed dur- ing facility life?		_NA
· j	ii. maximum hazardous waste in- ventory?	X	
÷	iv. estimated year of closure?		NA open ended
	v. schedule of closure activities?	<u> </u>	
c.	Has closure begun?		
Pos	t-Closure 265.118	· · · · · · · · ·	·
3.	Is the post-closure plan available for inspection?	-	
b.	Boes this plan contain:	•	٠
	i. description of groundwater monitoring activities and frequencies?		
	 ii. description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where appli- 		
	cable BB. facility monitoring equip-	**************************************	
i	ment ii. name, address, and phone number of person or office to contact during post-closure care period		
с.	Has the post-closure period begun?		
d.	Is the written post-closure cost estimate available? 265.144		
annlies.	only to disposal facilities.		
	and to araposar racificies.	G-1	4/82-A

Section I - US. AND MANGEMENT OF CONTAINERS (P : 265, Subpart I)

	YES NO	NI	Remarks
Are containers in good condition? 265.171	<u>X</u>		
Are containers compatible with waste in them? 265.172	X		
Are containers managed to prevent leaks?	<u>X</u>		
	<u>X</u>		
Are containers inspected weekly for leaks and defects.			
Are <u>ignitable</u> and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if	265.176		
waste is ignitable or reactive).	<u>×</u>		
Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<u>X</u> _	-	
Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			
	Are containers managed to prevent leaks? 265.173 Are containers stored closed? Are containers inspected weekly for leaks and defects. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177 Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient	Are containers compatible with waste in them? 265.172 Are containers managed to prevent leaks? Are containers managed to prevent leaks? 265.173 Are containers stored closed? Are containers inspected weekly for leaks and defects. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177 Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient	Are containers compatible with waste in them? 265.172 Are containers managed to prevent leaks? 265.173 Are containers stored closed? Are containers inspected weekly for leaks and defects. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177 Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient

		YES NO	NI	Remarks			
l.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192						¢
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?	_/				_	
3.	Do continuous feed systems have a waste-feed cutoff?			24004 AV 2/0H2* FU			
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	265.193 —	Notice Property and the Control of t	· .			
5.	Are required daily and weekly inspections done? 265.194	-			-		
6.	in tanks protected or rendered non-	65.198 			-	- -	-
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)			Arramannum) de		· · · · · · · · · · · · · · · · · · ·	
8.	Has the owner or operator observed to buffer zone requirements for tanks of	he Nation	nal Fir g ignit	re Protect table or 1	tion Assoc reactive w	iations astes?	
	Tank capacity:gallons						
	Tank diameter:feet			•			
	Distance of tank from property 1	ine			feet		
	(See table 2 - 1 through 2 - 6 of Code - 1977" to determine compli	f NFPA's ance.)	"Flamm	able and	Combustibl	e Liquids	

Section J - TANKS (Part 265, Subpart J)

Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	YES NO	WI.	Kemarks	ala formation (consequence)
2.	Do earthen dikes have protective covers? 265.223	i .		Promotorial for the system of the state of t	794490,000 (2010) www.dom
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225				
4.	Is the freeboard level inspected at least daily? 265.226				
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?				
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229				
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

		YES	NO	NI	Remarks		
1.	Are waste piles covered or protected from dispersal by wind? 265.251		7.	-000-000-00-00-000-00-00-00-00-00-00-00	da en escapa de la composition della composition	W 104 (100 (104 (104 (104 (104 (104 (104	
2.	Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	E .					
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253			TANKS PROGRAMENTO COMMANDO		·	Provide the second seco
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256		-				•
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?		**************************************	-	-		· · · · · · · · · · · · · · · · · · ·
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257			<u>.</u>	THE STATE OF THE S		·
7.	Are piles of incompatible waste protected by barriers or distance from other waste?	<u></u> .					

Section M - LAND TREATMENT (Part 265, Subpart M)

		YES	NO	NI	Remark	S	4.5
1.	Is treated hazardous waste capable of biological or chemical degradation? 265.272	-	-			-	
2.	Are run-off and run-on diverted from the facility or collected		• · · · · · · · · · · · · · · · · · · ·	·			
3.	Is waste analyzed according to 265.273?				· ·		 -
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?						
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	- -					 :
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?					· ·	
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279						
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281				AM THE STREET		
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282			·	:		

-		<i>;</i>	<u>tion N - LANDE</u>	FILLS	(Part	265,	part	N)		
				YES	NO	NI	Remark	S		
•	Gen Doe	eral Operating Require s the facility provid	ements 265.302 e the following:							
	a.	Diversion of run-on active portions of t				·				-
	b.	Collection of run-of portions of the fill		-	42707-5272-52		-			: :
-	C.	Is collected run off	treated?	**····		and the state of t	-		· · · · · · · · · · · · · · · · · · ·	1
	d.	Control of wind disp hazardous waste?	ersal of					-		
2		veying and Recordkeepes the Operating Recor							÷	
	a.	A map showing the example and dimensions of ea				-	-	-	· · · · · · · · · · · · · · · · · · ·	,
	b.	The contents of each location of each haz type withing each ce	ardous waste	4		<u>-</u>		-		
3.	rea act mix act	ecial requirements for active waste. Are ign tive wastes treated so xture is no longer ign tive? (Indicate if was reactive.) 265.312	itable or re- o the resulting nitable or re-					a a mara		
4.		ecial Requirements for stes. 265.313	- Incompatible							
	of ce	es the owner or operatincompatible waste in the protocol, the protocol, apply.	n separate visions of							

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

·	Sp a.		Are liqu If	requirements for liquid waste 265.314 bulk or non-containerized uids placed in the landfill? "yes," complete items i, ii, iii.								
			1.	Does the landfill have a chemically and physically resistant liner system?		·	winter-ma	-		-	· · · · · · · · · · · · · · · · · · ·	
		i	i.	Does the landfill have a functional leachate collection system?	***************************************			60-711.			h, South	
•		ii	1 •	Are free liquids stabilized prior to or immediately after placement in the landfill?	,			assaulta.		·	4s. 5	;
	b	•	liq	e containers holding free uids been placed in landfill uce March 22, 1982?	•	WAPERSON .		-		<u> </u>		-
6.	A s b	re hre efo	emp dde re	requirements for Containers ty containers crushed flat, 265 ed, or similarly reduced in volume being buried beneath the surface landfill?	.315		·		· · · · · · · · · · · · · · · · · · ·			- -

YES NO

NI

Remarks

	Sec	tion	O/P - INCINERATION AND THERMAL	TREAT	MENT (40 CFR P	art 265, Subparts O and P)
•	<u>Det</u>	-	ation of Steady State I=inciner of unit (i.e., type of inciner		T=the		eatment):
	b.	Comp	onents and steady state conditi	on:	I 265.	343 T	265.373
		Was	each component at steady state	prior	to ad	ding was	ste?
-			Component	YES	NO	NI	Remark s
		<u></u>			,	<u> </u>	
			•				

		-		_			· ·
			- In the way and the state of t	17-1-17 11		<u></u>	49-4333 -600-4332-4354-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-4-
2.	Wa:	ste Ai	nalysis I 265.345	T 265.	375		
	ā.		imum requirements, for wastes previously burned/treated.	<i>-</i>			•
.*		i.	Required analyses; has an analysis been performed for the following?			·	
			Heating value			**************************************	METANOSTICAL TO THE PARTY OF TH
			Halogen content				
			Sulfur content	***************************************	m 		
		ii.	Has documented or written data been substituted for analysis of either:				
٠			Lead?	•		******	
		•	Mercury:		025 *** 000*****		
							•

	b.	List other paramters for which the waste establish steady state or determine the (Note in Remarks any which you feel show	types	of p	olluta		
			VCC	NO	NI	Remarks	
3.	Mon	itoring and Inspections I 265.347 T 265.37	163	110	1A T	Kellig 1 K 2	
	٥.	Are combustion/emission control instruments monitored at least every 15 minutes?					
	b.	Is steady state maintained or corrections attempted?					
	C.	Is stack plume observed at least hourly for normal color and opacity?					· · · · · · · · · · · · · · · · · · ·
	d.	Did any stack observations made by owner or operator show a plume different than normal?**			- All Victorial de Palla		
	e.	If "yes" to (d) above, were corrections made to return emissions to normal appearance?**		. <u></u>		·	
14. 12. 13.	f.	Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?		· ————————————————————————————————————	o <u>************************************</u>		
*		ecify in Remarks for what period of time is was checked.				•	
	g.	Are emergency shutdown controls and system alarms checked daily for proper operation?	*****				
4.	0ре	en Burning T 265.382 (open burning does r	ot ap	ply t	o incir	neration)	
	∵a.	Only complete this part if the facility open burns hazardous waste.	•				
		i. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned).					-
			•				

ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants		nce from open tonation to the others
0 to 100	204 m	670 ft
101 to 1,000	380 m 530 m	1,250 ft 1,730 ft
10,0001 to 30,000	690 m	2,260 ft

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q	Section Q	- CHEMICAL.	PHYSICAL	AND	BIOLOGICAL	TREATMENT	(Part 265.	Subpart	0
--	-----------	-------------	----------	-----	------------	-----------	------------	---------	---

		YES	МО	NI	Remarks	
	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401					
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	Application of the Principal State of the Pri		-		
3.	Has the owner or operator addressed the waste analysis requirements of 265.402?	-		S SERVICIONOS		
4.	Are inspection procedures followed according to 265.403?			;	446	P
5.	Are the special requirements fulfilled for ignitable or reactive wastes? 265.405			© SSES hadain+∀		-
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406				·	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

~			4	~
Se	Cti	on	Α:	Scope

٦.	 Complete this Appendix if the owner or operator of a TSD 	facility also generates
	hazardous waste that is subsequently shipped off-site fo	
	or disposal.	

Section B:	MANIFEST	REQUIREMENTS	(Part	262,	Subpart	B)	ŀ

٠		YES NO NI Remarks	
(1)	Does the operator have copies of the manifes available for review? 262.40	st	-
(2)	Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.	30	
(3)	Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21	-	
	a. Manifest document number?	<u> </u>	
: .	 Name, mailing address, telephone number, and EPA ID number of Generator 	<u>X</u> _ · _	
	c. Name and EPA ID Number of Transporter(s)?	X	
	d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u> </u>	
	e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X	
	f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	
	g. Required certification?	<u> </u>	
	h. Required signatures?	X	
(4)	Reportable exceptions 262.42		
	a. For manifests examined in (2) (except fenter the number of manifests for which signed copy from the designated facility ment.	h the generator has <u>NOT</u> received	ia

4/82-A

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. NA

Sec	tion C: PRE-TRANSPORT REQ REMENTS (Part 262,	Subpart	C)		
	Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	YES \times	NO	NI	Remarks
2.	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	X	Programme ((filmen)	1000-t-0	
3.	If required, are placards available to transporters of hazardous waste? 262.33	, , , , , , , , , , , , , , , , , , ,	**************************************	土	
4.	On-site accumulation of generated hazardous waste it generates either (A) in its storage with 40 CFR 262.34 [see 265.1(c)(7)]. Option and containers. If the installation elects opto Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 Reference of the section of	facility B restri ption A, ion B, co	[265. cts a check	l(b)] ll ac this	or (B) in accordance cumulation to tanks box [X] and skin
	a. Is each container clearly marked with the start of accumulation date?	_			
	b. Have more than 90 days elapsed since the date inspected in (a)?	 	-		
	c. Do wastes remain in accumulation tanks for more than 90 days?		***************************************		
	d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	87000 A.Co.		************************************	
Sec	tion D: - RECORDKEEPING AND REPORTING (Part 26	2, Subpar	t D)		
1.	Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	YES	NO	NI	Remarks
Sec	tion E: - INTERNATIONAL SHIPMENTS (Part 262, S	ubpart E)		
	Has the installation imported or exported Hazardous Waste? 262.50	auvauna			
	(If answered Yes, complete the following as applicable.)	-			
	a. Exporting Hazardous waste; has a generator:				

i.		ified the Administrator in ting?						
	ii.	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	 -	The second secon			Para de la companya d	
	iii.	Met the Manifest requirements?		***************************************	NGS NGS	· ·		
•	the g	ting Hazardous Waste; has generator met the manifest rements?					· .	

YES NO

NI

Remarks

Appendix TR

Sec	tion A: SCOPE:	YES	МО	N1	Remarks	-	
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	400.750VII—8p					·
2.	Does the transporter transport hazardous waste into the U.S. from abroad?					· · · · · · · · · · · · · · · · · · ·	
3.	Does the transporter transport hazardous waste out from the U.S.?		4000001		- MANAGEN BOOK SAN CANADA		
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		· · · · · · · · · · · · · · · · · · ·	- W	·		
<u>Sec</u>	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	, Sub	part B)		
1.	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22	-		* *************************************	SEPOSE AND THE ACT OF	, , , , , , , , , , , , , , , , , , ,	· · · · · · · · · · · · · · · · · · ·
2.	Estimate the number of manifests for shipments completed during the part 6 months.	NAMES AND ADDRESS OF THE PARTY		* TURNOUT		•	·
3.	Examine a representative number of manifests. Indicate number examined.				0		
4.	Did transporter properly sign and date the manifests examined?	********	**********	•			
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21	-		-			· ·
	If (5) is "no," skip 6 and 7.	******		-			
6.	Do any manifests indicate shipments delivered to other than an alternate facility?		·	· · · · · · · · · · · · · · · · · · ·			
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?			-			

D. Corrective Action



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Warner Johnson Field Operations Manager General Motors Corporation, Fisher Body Division Fleetwood Plant West Fort Street and West End Avenue Detroit, Michigan 48209

Re:

Visual Site Inspection

Former General Motors Corporation, Fisher

Body Division Fleetwood Plant Detroit, Michigan MID 980 700 876

Dear Mr. Johnson:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief

Minnesota/Ohio Technical Enforcement Section

RCRA Enforcement Branch



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7



PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118



PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

FORMER GENERAL MOTORS CORPORATION FISHER BODY DIVISION, FLEETWOOD PLANT DETROIT, MICHIGAN MID 980 700 876

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. : C05087

EPA Region : 5

 Site No.
 :
 MID 980 700 876

 Date Prepared
 :
 March 22, 1993

 Contract No.
 :
 68-W9-0006

 PRC No.
 :
 009-C05087MI4D

Prepared by : PRC Environmental Management, Inc.

(Tim Oliver)

Contractor Project Manager : Shin Ahn
Telephone No. : (312) 856-8700
EPA Work Assignment Manager : Kevin Pierard

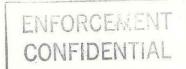
Telephone No. : (312) 886-4448

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1.	FACILITY LOCATION
2	FACILITY LAYOUT9



EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the General Motors Corporation, Fisher Body Division, Fleetwood Plant (GMC) facility in Detroit, Wayne County, Michigan. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The GMC facility was an automotive body assembly and components manufacturing plant. The plant ceased operation on December 22, 1987. In December 1988, the facility was sold to Fort Street Properties, Inc. This investment group is currently completing the demolition of all former structures at the facility so that the property can be redeveloped. Automotive manufacturing operations at this facility began in the early 1900s. Facility representatives could not determine when GMC ownership began. The facility occupies approximately 44 acres in a mixed-use area in the southern portion of the city of Detroit.

No wastes are currently generated at the facility; however, facility records indicate that the following hazardous wastes were generated and stored at the facility: waste lacquer (D001); waste thinner (D001); waste paint (D001 and D008); waste solvents (D001, F002, F003, and F005); waste adhesive (D001); waste solvent-soiled rags (D001); waste oils (D001); waste caustic stripping compound (D001); solder grind roof waste (D008); and wastewater pretreatment sludge (F006). Nonhazardous plating rinse water, numerous types of nonhazardous waste oils, and transformer oil were also generated at the facility.

GMC's Part A permit application included container storage at the Former Hazardous Waste Drum Storage Pad (SWMU 1). The facility submitted a request for withdrawal of the Part A permit application in 1983. This request was subsequently denied by EPA because the facility could not provide sufficient documentation to prove that the facility had never stored hazardous waste for more than 90 days at SWMU 1. Based on this denial, the facility completed a paperwork RCRA-closure of SWMU 1 in 1984, stating that all wastes stored at the facility for greater than 90 days had been removed. No sampling or decontamination procedures were involved in the closure, and no formal closure plan was submitted. Closure approval was granted by the Michigan Department of Natural Resources (MDNR) in 1984. It should be noted, however, that although EPA considers the facility to have attained interim status, MDNR does

RELEASED DATE

ENFORCEMENT CONFIDENTIAL not consider this facility a former RCRA-treatment, storage, or disposal facility. MDNR granted GMC withdrawal of their Part A permit application; however, MDNR was not authorized to implement the RCRA program when the withdrawal was granted.

The PA/VSI identified the following nine SWMUs and one AOC at the facility:

Solid Waste Management Units

- 1. Former Hazardous Waste Drum Storage Pad
- 2. Former Wastewater Pretreatment System
- 3. Former Waste Solvent Storage Tank
- 4. Former Paint Sludge System
- 5. Former Caustic Stripper Tank
- 6. Former Electrodepositional (ELPO) Paint Strainers and Bag Filters
- 7. Former Solder Grind Roof Waste Vacuum Station
- 8. Former Maintenance Department Paint Spray Booth Sump
- 9. Former Hazardous Waste Collection Stations

Area of Concern

1. PCB Transformer Containment Area

The potential for a release to ground water, surface water, air, and on-site soils from all SWMUs and AOC 1 is low, because the facility is no longer active and no longer handles hazardous waste.

No groundwater wells have been identified within 3 miles of the facility. The nearest surface water is the Rouge River, which is located about 0.5 mile southeast of the facility. The river is used for industrial and recreational purposes. Residential areas are located within 0.25 mile on all sides of the facility; however, the facility property is surrounded by an 8-foot, chain-link fence and is monitored by a security guard 24 hours a day. No sensitive environments have been identified within 2 miles of the facility.

Some standing liquid was observed in open raceways and sumps in the Former Wastewater Pretreatment System (SWMU 2) and PCB Transformer Containment Area (AOC 1). PRC recommends that the facility characterize this liquid and properly remove and dispose of the liquid before completing the demolition of these areas. No further action is recommended for the Former Hazardous Waste Drum Storage Pad (SWMU 1) and SWMUs 3 through 9.

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INITIALS

ENFORCEMENT CONFIDENTIAL

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the General Motors Corporation, Fisher Body Division, Fleetwood Plant (GMC) facility (EPA Identification No. MID 980 700 876) in Detroit, Wayne County, Michigan. The PA was completed on December 17, 1992. PRC gathered and reviewed information from the Michigan Department of Natural Resources (MDNR), Wayne County Air Pollution Control Division (WCAPCD), and from EPA Region 5 RCRA files. The VSI was conducted on January 19, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified nine SWMUs and one AOC at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and nine inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C. Attachment D includes information regarding the off site disposal of two former transformers containing polychlorinated biphenyls (PCB) that were located in the PCB Transformer Containment Area (AOC 1). Attachment E includes a list of waste collection stations included in the Former Hazardous Waste Collection Stations (SWMU 9).

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

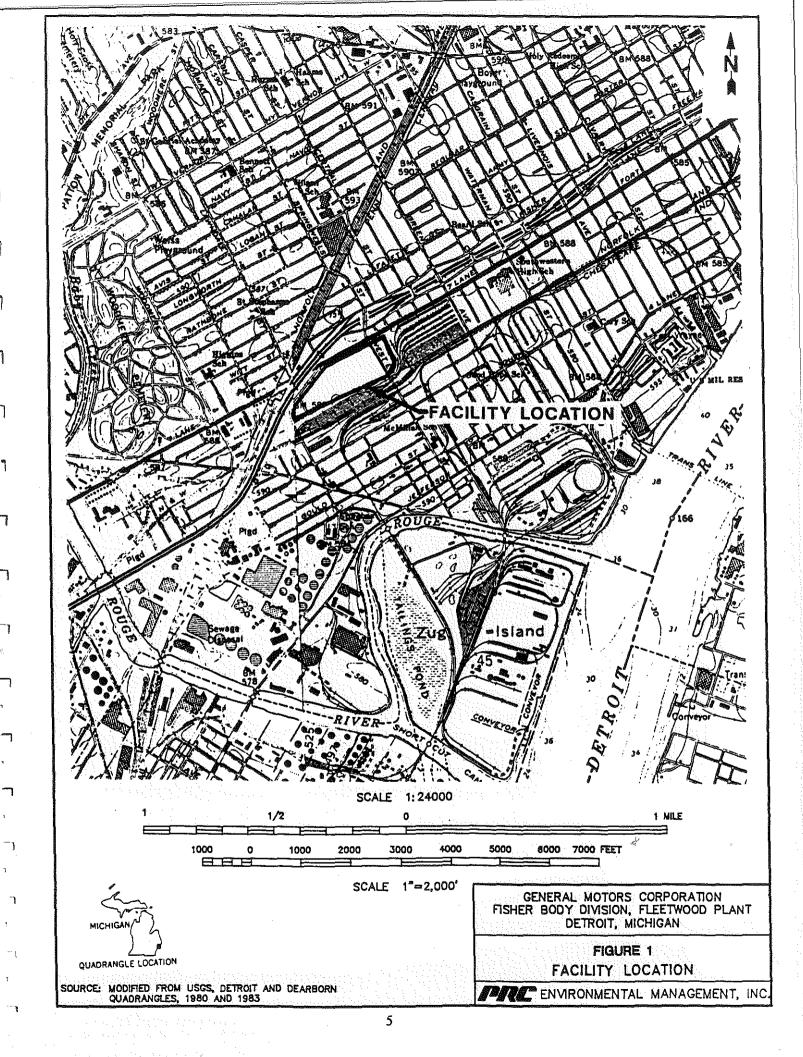
The GMC facility is located at West Fort Street and West End Avenue in Detroit, Wayne County, Michigan. Figure I shows the location of the facility in relation to the surrounding topographic features (latitude 42°17'50" N and longitude 83°07'25" W). The facility also included one former assembly building to the northeast of West End Avenue and Springwell Avenue that was formerly connected to the main part of the facility via an over-the-street walkway and conveyor line. The facility occupies about 44 acres in a mixed-use area.

The facility is bordered on the northeast by Springwell Avenue and the Detroit Produce Company and on the east by a Norfolk and Western Railroad switching yard. Beyond the switching yard is a mixed-use area. Businesses to the southeast include Meridian Environmental Services, MPC Environmental Services, and McGutherie Lumber. The facility is bordered on the southwest by vacant lots and on the northwest by Interstate 75 and West Fort Street. The area west of West Fort Street is comprised of vacant lots and businesses, including Metro Automotive Muffler and a Marathon Oil service station. Some of the vacant lots are former parking lot areas for the facility.

2.2 FACILITY OPERATIONS

The GMC facility was an automotive body assembly and components manufacturing plant. Automotive manufacturing operations began at the facility in the early 1900s; however, facility representatives could not provide information regarding previous owners or the date that GMC operations began at the facility. The plant ceased operation on December 22, 1987. In December 1988, the facility was sold to Fort Street Properties, Inc. This investment group is currently completing the demolition of all former structures at the facility so that the property can be redeveloped.

Currently, there are only four buildings remaining at the facility. The first is the Former Wastewater Pretreatment System (SWMU 2) building which has an area of 3,000 square feet. The second building still standing is the former assembly building (Building 7) which is located northeast of West End Avenue. It has an area of 88,000 square feet and is two stories tall. The



third building is a guard building and the fourth is a maintenance building that measures 4,000 square feet. Facility representatives stated during the VSI that these remaining structures will also be demolished in the future. Large piles of rubble are currently the main feature of the former facility's property (see Photograph Nos. 1 through 6). The property was a residential area prior to the construction of the facility sometime in the early 1900s.

Four former underground storage tanks were identified at the facility during the PA/VSI: two 6,700-gallon gasoline tanks, a 5,000-gallon product mineral spirits tank, and a 15,000-gallon product thinner tank. The gasoline tanks were located south of Guard Post No. 9 and at Parking Lot No. 6, respectively. The mineral spirits and thinner tanks were located in the salvage yard. All four tanks were reportedly emptied, cleaned, and removed in May and June 1988. No visible contamination or leaks were observed during the removal, and no samples were collected (PRC, 1993b).

2.3 WASTE GENERATION AND MANAGEMENT

No wastes are currently generated at the facility. Former SWMUs are identified in Table 1. The locations of SWMUs and AOCs in relation to the facility layout are shown in Figure 2. Wastes generated in the past by the facility are summarized in Table 2. Available information regarding the generation, storage, and off-site disposal of hazardous wastes at the facility is presented below. No off-site generated wastes were accepted by the facility (MDNR, 1983a).

Painting operations at the facility generated waste lacquer (D001), waste thinner (D001), waste paint (D008), and waste solvents (F002, F003, and F005). These wastes were accumulated in 55-gallon drums at the Former Hazardous Waste Collection Stations (SWMU 9) located throughout the facility and at the Former Maintenance Department Paint Spray Booth Sump (SWMU 8). The drums were then transferred to the Former Hazardous Waste Drum Storage Pad (SWMU 1) to await transport to an off-site disposal facility. Waste thinner (D001) and waste solvents (F002, F003, and F005) were collected at the Former Waste Solvent Storage Tank (SMWU 3). Waste paint (D008) was also collected at the Former Paint Sludge System (SWMU 4) and the Former ELPO Paint Strainers and Bag Filters (SWMU 6). In 1985, GMC shipped 144,260 gallons of waste lacquer and waste thinner to Petro-Chem Processing, Inc. (Petro-Chem) of Detroit, Michigan (MID 980 615 298), and 33,300 gallons of waste paint to Chem-Met Services (Chem-Met) of Wyandotte, Michigan (MID 096 063 194), for disposal (GMC, 1986). Waste solvents from painting operations were also transported to Chem-Met for disposal. No information regarding the volume of these solvents was available. No information was available concerning the method of waste disposal used at these facilities.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste <u>Management Unit</u> ^a	Status
1	Former Hazardous Waste Drum Storage Pad	Yes	Inactive, underwent RCRA closure in 1984
2	Former Wastewater Pretreatment System	No	Inactive
3	Former Waste Solvent Storage Tank	No	Inactive
4	Former Paint Sludge System	No	Inactive
5	Former Caustic Stripper Tank	No	Inactive
6	Former Electrodisposition (ELPO) Paint Strainers and Bag Filters	No	Inactive
7	Former Solder Grind Roof Waste Vacuum Station	No	Inactive
8	Former Maintenance Department Paint Spray Booth Sump	No	Inactive
9	Former Hazardous Waste Collection Stations	No	Inactive

Note:

A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2 SOLID WASTES

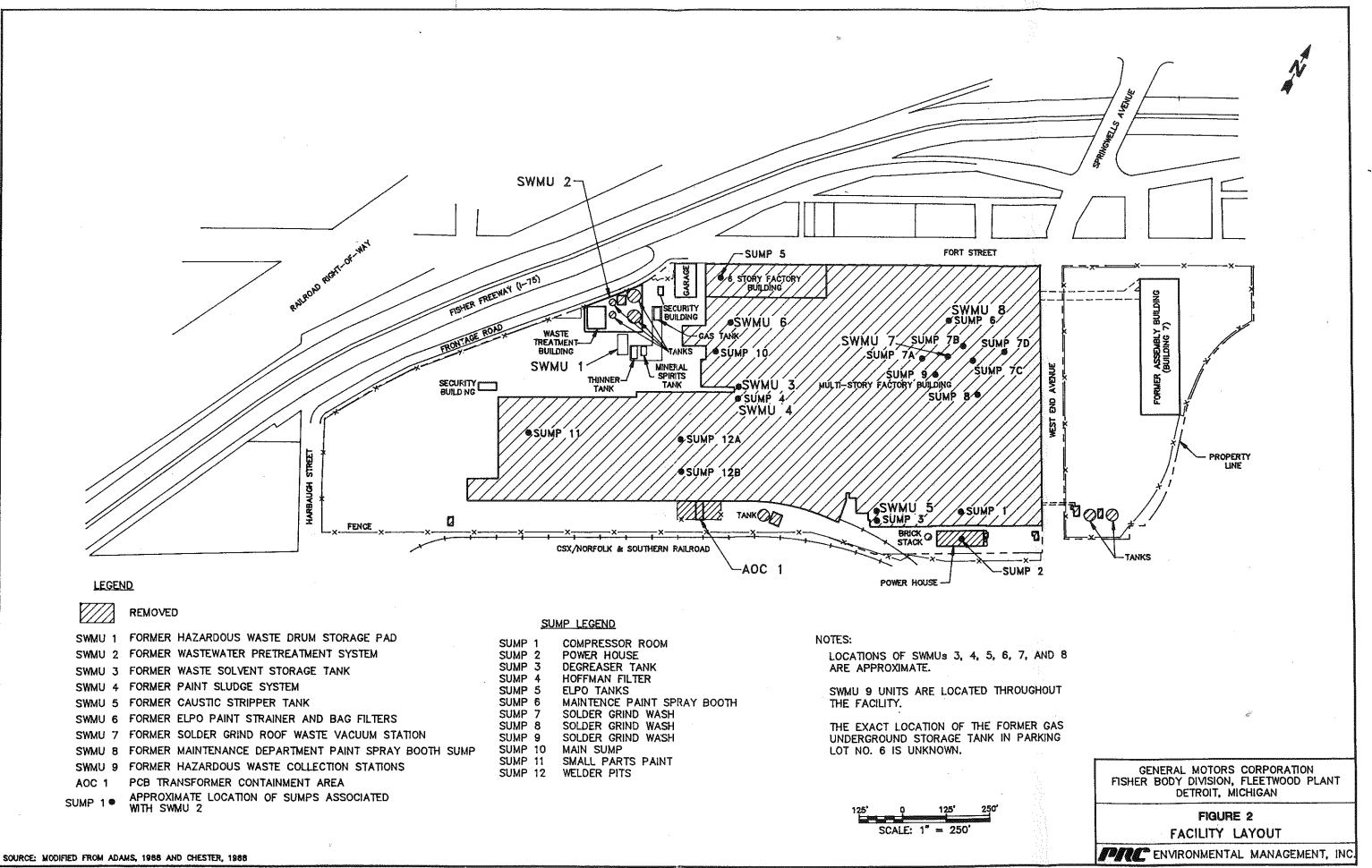
Waste/EPA Waste Code ^a	Source	Solid Waste <u>Management Unit^b</u>
Waste Lacquer/(D001)	Painting Operations	1, 8, and 9
Waste Thinner/(D001)	Painting Operations	1, 3, 8, and 9
Waste Paint/(D001, D008)	Painting Operations, Facility Maintenance	1, 4, 6, 8, and 9
Waste Solvents/(D001, F002, F003, and F005)	Painting and Assembly Operations	1, 3, 8, and 9
Waste Adhesive/(D001)	Assembly Operations	1 and 9
Waste Solvent-Soiled Rags/(D001)	Assembly Operations	1 and 9
Waste Oils/(D001)	Facility Maintenance	1 and 9
Waste Caustic Stripping Compound/(D001)	Facility Maintenance	1, 5, and 9
Solder Grind Roof Waste/(D008)	Unknown	1 and 7
Wastewater Pretreatment Sludge/(F006)	Wastewater Pretreatment Operations	. 2
Plating Rinse Waters/(NA)	Plating	2
Nonhazardous Waste Oils/(NA)	Facility operations	Unknown
Transformer Oil/(NA)	Facility transformers	None

Notes:

a Not applicable (NA) indicates a nonhazardous waste.

b None indicates waste stream not managed on site.

^c Unknown indicates no SWMUs associated with this waste were identified.



The body assembly operations at the facility generated waste adhesive (D001), waste solvents (D001), and solvent-soiled rags (D001). These wastes were accumulated in 55-gallon drums at various Former Hazardous Waste Collection Stations (SWMU 9) throughout the facility. The drums were then transferred to the Former Hazardous Waste Drum Storage Pad (SWMU 1) before transport to an off-site disposal facility. In 1985, GMC generated from assembly operations 8,380 gallons of waste adhesive, 12,320 gallons of waste solvent, and 18,796 pounds of solvent-soiled rags. These wastes were disposed of by Petro-Chem and Chem-Met (GMC, 1986). No information was available concerning the method of waste disposal used by these facilities.

The maintenance department generated waste paint, waste oils, and waste caustic striping compounds all classified as D001 wastes. These wastes were accumulated in 55-gallon drums in Former Hazardous Waste Collection Stations (SMWU 9) located throughout the facility. The drums were then transferred to the Former Hazardous Waste Drum Storage Pad (SWMU 1) before transport to an off-site disposal facility. Waste caustic stripping compound was also collected in the Former Caustic Stripper Tank (SWMU 5). In 1985, GMC generated from maintenance operations 6,950 gallons of waste paint, 1,035 gallons of waste oils, and 12,900 gallons of waste caustic stripping compound. These wastes were disposed of by Petro-Chem and Chem-Met (GMC, 1986). No information was available concerning the method of waste disposal used by these facilities.

Solder grind roof waste (D008) (lead dust) was also generated at the facility. This waste was accumulated in 55-gallon drums at the Former Solder Grind Roof Waste Vacuum Station (SWMU 7). The drums were then transferred to the Former Hazardous Waste Drum Storage Pad (SWMU 1) before transport to an off-site disposal facility. The amount generated was not provided by facility representatives. This waste was taken off site by Chem-Met, A and B Terra (EPA Identification No. MID 017 167 222), and Inland Waters Pollution Control (EPA Identification No. MID 000 820 365) to Chem-Met and Wayne Disposal, Belleville, Michigan (EPA Identification No. 048 890 033). The information reviewed did not indicate the locations of the waste transporter.

GMC used the following transporters to transfer waste materials generated by their painting operations, body assembly department, and maintenance department from the GMC facility to the disposal locations: A and B Terra, Drury Brothers (MID 056 988 892), Environmental Management (MID 980 681 621), Inland Waters Pollution Control, Chem-Met, Marine Pollution (MID 049 277 718), Michigan Pumping Services, Inc. (MID 010 871 234), K & D Industrial Services (MID 072 790 710), Petro-Chem, and Quanta Corporation (MID 980 793 350). The locations of these facilities were not identified in the information reviewed (GMC, 1986; 1993a).

The facility operated the Former Wastewater Pretreatment System (SWMU 2) for the pretreatment of wastewater generated at the facility. The treated wastewater was discharged to the City of Detroit municipal sanitary sewer system. Since plating rinse waters were discharged to the treatment plant, the facility managed the wastewater pretreatment sludge as F006 waste. The wastewater pretreatment sludge, after removal from the treatment tank, was filter-press dewatered. In 1985, 109,088 gallons of wastewater pretreatment sludge were generated from wastewater pretreatment operations. The sludge was transported by Waste Management of Michigan-West (Waste Management) (MID 980 996 920) and American Waste Oil Company (EPA Identification No. MID 050 598 390) off site for disposal. Michigan Disposal of Dearborn, Michigan (MID 000 724 831), accepted 89,688 gallons of the sludge and Chem-Met received 19,400 gallons (GMC, 1986). No information was available regarding the methods of disposal used by these facilities.

Nonhazardous waste oils were also generated by the facility. No SWMUs associated with the management of these wastes were identified during the PA/VSI. These wastes were transported and disposed of by the same companies used for hazardous waste. No information was available regarding the volume of waste oils generated annually.

In January 1993, fluid from two transformers formerly located at the PCB Containment Area (AOC 1) was transported off site by Transtec Environmental, Inc. (EPA Identification No. OHD 987 012 838), to ENSR of Canton, Ohio (EPA Identification No. OHD 981 100 969) for disposal (see Attachment D). The liquid reportedly contained less than 500 parts per million PCBs (see Attachment D).

The facility's Part A permit application also included waste codes F001, F005, F008, F009, D002, and U123 (formic acid). No information about these wastes were provided by the facility.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

Air emissions violation notices were issued by the Wayne County Air Pollution Control Division (WCAPCD) in 1968, 1969, 1977, and 1983. The violations were related to emissions originating from the powerhouse stack and painting operations (WCAPCD, 1986). No information was available regarding corrective actions relating to emission violations.

2.5 REGULATORY HISTORY

On August 18, 1980, GMC submitted a Notification of Hazardous Waste Activity identifying the facility as a generator and treatment, storage, or disposal (TSD) facility (GMC, 1980a). GMC submitted a Part A permit application on November 19, 1980 (GMC, 1980b). The Part A permit application listed the following process codes and capacities: container storage (S01) at the Former Hazardous Waste Drum Storage Pad (SWMU 1), 55,000 gallons; tank storage (S02), 15,000 gallons; tank treatment (T01), 832,000 gallons per day; and tank treatment (T04), 6,000 gallons per day. The S02, T01, and T04 process code represent parts of the facility's Former Wastewater Pretreatment System (SWMU 2). EPA waste codes and estimated quantities identified in the Part A permit application were as follows: F001, 3,410 pounds; F005, 126 tons; F006 and F018, 352 tons; F008, 93 tons; F009, 5 tons; F017, 687 tons; D001, 32 tons; D002, 12,159 pounds; and U123, 525 pounds.

EPA initially assigned the facility a temporary identification number, MIT 270 012 566. In January, 1983, a permanent identification number, MID 980 700 876, was assigned to the facility (EPA, 1982).

On July 6, 1983, GMC petitioned EPA for withdrawal of the Permit A application, and stated that the facility was not a RCRA storage facility (GMC, 1983b). The request for withdrawal of the Part A permit application was denied by EPA on September 8, 1983, because GMC could not provide enough documentation to prove that the facility had never stored hazardous waste for more than 90 days in the Former Hazardous Waste Drum Storage Pad (SWMU 1) (EPA, 1983). The July 6, 1983 request to EPA from GMC did state that the facility's treatment capacity (T01 and T04) and tank storage capacity (S02) was part of the Former Wastewater Pretreatment System (SWMU 2), and therefore not subject to regulation under RCRA. This information was never questioned by EPA. Based on the EPA denial, GMC subsequently submitted a request for a change in status from that of a TSD to that of a generator only on January 30, 1984. The request contained certification that all hazardous wastes stored for more than 90 days had been removed from the facility (GMC, 1984). A public notice of closure of the facility's container storage area was published on March 11, 1984 (EPA, 1984a). The certification and public notice served as a paperwork RCRA-closure for SWMU 1. Closure approval was granted by EPA in 1984, reclassifying the facility only as a generator of hazardous waste, accumulating waste for on-site storage for periods of less than 90 days (EPA, 1984b). Although MDNR inspected the facility in March 1983 as a TSD facility, it should be noted that MDNR does not consider this facility a former TSD that attained interim status (MDNR, 1983a; PRC, 1992 and 1993a). MDNR granted GMC withdrawal of their Part A permit application; however,

MDNR was not authorized to implement the RCRA program when the withdrawal was granted (PRC, 1992 and 1993a).

On April 12, 1983, the facility was notified of its failure to properly complete a waste disposal manifest (MDNR, 1983b). GMC reissued a properly completed manifest on April 25, 1983 (GMC, 1983a).

The facility operated the Former Wastewater Pretreatment System (SWMU 2) for the treatment of wastewater generated at the facility. Treated wastewater was discharged to the City of Detroit municipal sanitary sewer system. The wastewater pretreatment sludge (F006) was removed from the treatment tank, filtered-press dewatered, and transported by Waste Management to Michigan Disposal and Chem-Met. Current facility representatives could not provide any information regarding permits held by the facility while it was in operation.

The facility obtained numerous air emissions certificates for various plant operations from WCAPCD. Permitted operations for air emissions from the plant included paint and lacquer spray booths, welding and brazing exhaust, and boiler operations (WCAPCD, 1986).

On October 28, 1987, General Motors Corporation was served with a Consent and Final Order stating that several of its assembly plants, including the GMC - Fleetwood Plant facility, had not fully complied with the terms of various orders of the Michigan Air Pollution Control Commission relating to the emission of volatile organic compounds from painting operations. GMC complied with the Consent Order by agreeing to close the entire facility by December 31, 1987 (GMC, 1987).

No water discharge violations or CERCLA activities have been documented at this location.

The facility ceased operations on December 22, 1987. In December 1988, the facility was purchased by Fort Street Properties, Inc., with the intention of demolishing the existing structures and redeveloping the property. Documents obtained from the WCAPCD referred to asbestos removal from pipes and boilers prior to demolition of the buildings. Facility representatives stated during the VSI that all asbestos was removed before the buildings were demolished.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Wayne County is influenced by nearby Lake St. Clair. The average daily temperatures range from a high of 83.1 degrees Fahrenheit (°F) in July to a low of 16.1 °F in January. The average daily temperature is 48.5 °F (NOAA, 1989).

Weather in the vicinity of Wayne County is controlled by major storm tracks and the influence of the Great Lakes. The Great Lakes act to mitigate most climatic extremes. Summer storms usually pass to the north and are often associated with brief showers and sometimes thunder showers with high winds (PRC, 1990).

The total annual precipitation is 30 inches (USDC 1968). The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall is about 2 inches (USDC, 1963). The prevailing wind in the area is from the southwest and has an average wind speed of 10.3 miles per hour (NOAA, 1989).

Due to the topography of the area, the moist northwest air dries before reaching the Wayne County area. For example, the summer showers commonly coming from the northwest often dissipate before reaching the area. The winter northwesterly winds bring snow to all of Michigan, but snow rarely accumulates to measurable depths in the Wayne County area (PRC, 1990).

2.6.2 Flood Plain and Surface Water

The nearest surface water body is the Rouge River, which is located about 0.5 mile southeast of the facility. The Rouge River empties into the Detroit River about 1 mile southeast of the facility. Baby Creek is also located 0.75 mile west of the facility. This creek empties into the Rouge River about 1.0 mile southwest of the facility. All of the surface water bodies are used for recreational and industrial purposes; however, the locations of industrial water intakes were not identified during the VSI. Water for the City of Detroit comes from the Detroit River north of the metropolitan area, greater than 3 miles north of the facility. The facility is not located within a 100- or 500-year flood plain (Adams, 1988).

Storm water runoff from the facility flows into the storm sewer system. The location of the storm water discharge for storm water runoff from the facility was not identified during the VSI, but ultimately flows into the Detroit River.

2.6.3 Geology and Soils

The facility property is covered almost entirely by concrete and asphalt. Surface soils in the area are composed of fill material, although some areas of sandy or silty material may exist. No facility-specific geological information is available. The following paragraphs summarize regional geological information.

The surface geology of the Detroit area is characterized by a mosaic of glacial and organics deposits. Present land forms are the result of Pleistocene Epoch glaciation and subsequent deposition and erosion. These land forms consist primarily of materials deposited during the Cary substage of the Wisconsin Glacial stage; however, the hardpan encountered just above the bedrock in the downtown Detroit area occupies part of an ancient glacial lake bed of gently sloping to nearly flat terrain that has been incised by presently flowing rivers and streams. Glacial deposits over bedrock range in thickness from 120 to 200 feet in this area. These deposits consist mainly of layers of glacial till of varying thickness and a thick sequence of lacustrine clays and silts. The lacustrine clay and silt layer is locally called blue clay, and is approximately 90 feet thick (GMC, 1993a).

The bedrock of Detroit consists of approximately 850 feet of consolidated and cemented Middle Devonian limestone from the Paleozoic era. This Michigan basin structural feature underlies all of Michigan and portions of neighboring states. Within the structural basin, the sedimentary rocks dip at an angle of less than 1 degree toward the center of the basin, which is located beneath the central portion of the southern peninsula (Mozola, 1969).

2.6.4 Ground Water

Ground water in the area is found at approximately 40 feet beneath ground surface and generally flows toward the Detroit River. However, because the Detroit area is located on a glacial lake plain that is comprised primarily of silts and clays, the area is not favorable for the development of wells of moderate-to-large yields. Storage capacities are limited and well failures can be expected during prolonged droughts (USGS, 1989). Although the lake plain has a high frequency of dry holes, small domestic ground water supplies within intermittent zones have a relatively greater permeability than the surrounding clay and silt deposits. These intermittent zones occur under confined conditions and both flowing and non-flowing wells can be expected.

Southeast of the junction of the lake plain with the glacial moraines, moving toward the Detroit River, the frequency of occurrence, thickness, and extent of these confined ground-water bearing zones decreases (GMC, 1993a).

Although the silt and clay deposits have a limited ability to yield usable-quality water, the quality of the shallow ground water is usually soft and potable unless contaminated by man. In the aforementioned intermittent zones, mineralization increases with depth. Additionally, the quality of water from deep confined zones is often impaired by chloride, hydrogen sulfide, and methane gas (Mozola, 1969). No ground-water wells have been identified within 3 miles of the facility.

2.7 RECEPTORS

The facility is bordered on the north by Springwell Avenue and the Detroit Produce Company and on the northeast by a Norfolk and Western Railroad switching yard. Beyond the switching yard is a mixed-use area. Businesses to the southeast include Meridian Environmental Services, MPC Environmental Services, and McGutherie Lumber. The facility is bordered on the southwest by vacant lots and on the northwest by Interstate 75 and West Fort Street. The area west of West Fort Street is comprised of vacant lots and businesses, which include Metro Automotive Muffler and a Marathon Oil service station. Some of the vacant lots are former parking lot areas for the facility. The facility is fenced and is monitored by a security guard 24 hours a day. The nearest schools are Southwestern High School and Higgins School, located about 0.25 mile to the northeast and west of the facility, respectively.

No ground-water wells have been identified within 3 miles of the facility. Water for the City of Detroit comes from the Detroit River north of the metropolitan area, greater than 3 miles north of the facility. The nearest surface water body is the Rouge River, which is located about 0.5 mile southeast of the facility. The Rouge River empties into the Detroit River approximately one mile southeast of the facility. Baby Creek is also located 0.75 mile west of the facility. This creek empties into the Rouge River at about 1.0 mile southwest of the facility. All of the surface water bodies are used for recreational and industrial purposes; however, the locations of industrial water intakes were not identified during the VSI.

No sensitive environments, such as critical wildlife habitats or wetlands, were identified within 2 miles of the facility. The nearest public park is the General George Patton Memorial Park, which is located about 1.25 miles northwest of the facility. The metropolitan Detroit area has a population of over 1 million people.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the nine SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Hazardous Waste Drum Storage Pad

Unit Description:

This unit was an outdoor roofed, concrete, curbed area approximately 26 feet by 52 feet, located in the Salvage Yard. Hazardous wastes generated throughout the facility were collected in 55-gallon drums and brought to this area for storage before being taken off-site for treatment and disposal. The area had a capacity of about 100 drums.

Date of Startup:

According to facility representatives, this area was constructed in late 1982 or early 1983 (GMC, 1993b). However, this unit was included on the facility's Part A application in 1980. No further information was available.

Date of Closure:

The facility stopped using this unit for waste storage when the facility ceased operation in 1987. A review of the facility's hazardous waste manifests indicates that waste material was shipped off site until at least June 1988. The unit underwent RCRA closure in 1984. Decommissioning activities in June 1988 included high-pressure water blasting and analysis of the final rinsate for hazardous constituents.

Wastes Managed:

This unit was used to store hazardous wastes generated throughout the facility. These included waste paint (D001 and D008), solder grind roof waste (D008), and the following wastes characterized as hazardous because of ignitability (D001): waste lacquer, waste thinner, waste adhesive, waste solvents, waste solvent soiled rags, waste oils, and waste caustic stripping compound. The facility's Part A permit application also included waste codes F001, F005, F008, F009, D002, and U123 (formic acid). No information about these wastes was provided by the facility.

Release Controls:

This unit was an outdoor, concrete, curbed area located southeast of the Former Wastewater Pretreatment System (SWMU 2) building.

History of Documented Releases:

There have been no documented releases from this unit.

Observations:

This area was not discernable from the surrounding area because of ongoing demolition activities and snow on the ground. This unit is located southeast of the SWMU 2 building. The inspection team did not note any evidence of a release in this area during the VSI. The area was covered by 2 to 3 inches of snow at the time of the VSI.

SWMU 2

Former Wastewater Pretreatment System

Unit Description:

This unit consisted of a sump collection system leading to a wastewater pretreatment system. The sump system consisted of 12 different sumps. The approximate locations of these sumps are shown on Figure 2. The sumps led to a wastewater pretreatment system located in a 95- by 190-foot area in the Salvage Yard and wastewater pretreatment building. The system consisted of two 200,000-gallon treatment tanks, two 32,000-gallon sludge thickener tanks, two 3,000-gallon sludge conditioner tanks, a vacuum sludge filter unit, a sludge holding and shipping box, and a final sand filter. All of the system's components were constructed of steel.

Date of Startup:

The system began operation in 1972.

Date of Closure:

This unit ceased operation when the facility closed in 1987. The system was decommissioned, which included scraping, water blasting, and residue disposal, in July 1988.

Wastes Managed:

This system was used to pretreat facility wastewater, including plating rinse waters. This operation resulted in the generation of hazardous waste plating sludge (F006). The facility's Part A permit application also indicated that of F008 and F009 wastes, associated with cyanide plating operations, were generated. No information

was provided by the facility regarding the unit's generation of these wastes.

Release Controls:

The wastewater pretreatment system consisted of numerous aboveand below ground tanks, sumps, and underground piping. The aboveground tanks were located in concrete paved areas; however, no secondary containment was provided for the underground tanks, sumps, or piping.

History of Documented Releases:

There have been no documented releases from this unit.

Observations:

Most of the piping and aboveground tanks have been removed; however, several of the underground tanks, sumps, and piping raceways are still in place (see Photographs No. 7 and 8). Standing liquid was observed in the raceways and concrete sumps that were open inside the pretreatment system building.

SWMU 3

Former Waste Solvent Storage Tank

Unit Description:

This unit was located indoors at the west end of Building 5 on the first floor. The steel tank was 9- by 9- by 18 feet in size with a capacity of 6,000 gallons.

Date of Startup:

Facility representatives could not determine the date this unit began operating.

Date of Closure:

This unit was decommissioned in May 1988.

Wastes Managed:

This unit was used to store waste thinner (D001) and waste solvents (D001, F002, F003, and F005). No information regarding the disposition of wastes stored in this tank could be provided by the facility.

Release Controls:

This unit was located inside the building on a concrete floor. Sumps within the facility led to the Former Wastewater Pretreatment System (SWMU 2). History of

Documented Releases:

There have been no documented releases from this unit.

Observations:

This unit was not observed during the VSI. The tank was decomissioned and removed in May 1988, and the building was

demolished.

SWMU 4

Former Paint Sludge System

Unit Description:

This unit was located at the west end of Building 5 on the first floor. It consisted of a 9- by 30- by 5-foot-high Hoffman Filter, a Flyte sludge conveyor, a 21- by 90- by 12-foot-deep Hoffman sludge tank (168,000 gallons), four 3-foot-diameter roto-strainers, and a 9- by 24- by 6-foot-deep roto-strainer sludge tank. All of

the tanks were made of steel.

Date of Startup:

Facility representatives could not determine the date this unit

began operating.

Date of Closure:

This unit was decommissioned in July 1988.

Wastes Managed:

This unit was used to handle waste paint (D001 and D008).

Release Controls:

This unit was located on a concrete floor and surrounded by concrete curbs. The unit was located indoors. Sumps within the building led to the Former Wastewater Pretreatment System

(SWMU 2).

History of

Documented Releases:

There have been no documented releases from this unit.

Observations:

This unit was not observed during the VSI. This unit was decommissioned in July 1988, and the building was demolished.

SWMU 5

Former Caustic Stripper Tank

Unit Description:

This unit was located at the south end of Building 1-A on the first

floor, and consisted of a 10- by 40- by 4-foot-deep (11,800-

gallon) steel tank.

Date of Startup:

Facility representatives could not determine the date this unit

began operating.

Date of Closure:

This unit was decommissioned in May 1988.

Wastes Managed:

This unit was used to store waste caustic stripping compound

(D001).

Release Controls:

This unit was located on a concrete floor inside Building 1-A. It

was surrounded by concrete curbs, trenches, and sumps.

History of

Documented Releases:

There have been no documented releases from this unit.

Observations:

This unit was not observed during the VSI. It was decommissioned

in May 1988, and the building was demolished.

SWMU 6

Former ELPO Paint Strainers and Bag Filters

Unit Description:

This unit was located in Building 5 on the third floor near column G5. It consisted of two paint strainers that were 15 feet long and 18 feet in diameter and three bag filters. The unit was made of

steel.

Date of Startup:

The date this unit began operating could not be determined by

facility representatives.

Date of Closure:

This unit was decommissioned in June 1988.

Wastes Managed:

This unit was used to handle waste paint (D001 and D008). No

information regarding the disposition of this waste was provided by

facility representatives.

Release Controls:

This unit was located indoors on a concrete floor. It was surrounded by concrete curbs, trenches, and sumps.

History of

Documented Releases:

There have been no documented releases from this unit.

Observations:

This unit was not observed during the VSI. It was decommissioned in June 1988, and the building was subsequently demolished.

SWMU 7

Former Solder Grind Roof Waste Vacuum Station

Unit Description:

This unit was located in Building 3 on the first floor near column H26. It consisted of a 10- by 10-foot area containing two 55-gallon drums used to collect solder grind roof waste from two high efficiency particulate absolute (HEPA) filters.

Date of Startup:

The date this unit began operating could not be determined by facility representatives.

Date of Closure:

This unit was decommissioned in May 1988.

Wastes Managed:

This unit was used to collect solder grind roof waste (D008) (lead dust).

Release Controls:

This unit was located indoors on a concrete floor. Sumps within the building led to the Former Wastewater Pretreatment System (SWMU 2).

History of

Documented Releases:

There have been no documented releases from this unit.

Observations:

This unit was not observed during the VSI. It was decommissioned in May 1988, and the building was subsequently demolished.

SWMU 8

Former Maintenance Department Paint Spray Booth Sump

Unit Description:

This unit was located in Building 4A on the first floor near column F15. The 3- by 3- by 5-foot-deep (330-gallon) concrete sump was used to collect waste lacquer (D001), waste thinner (D001), waste paint (D001 and D008), and waste solvents (D001, F002, F003, and F005) from the paint spray booth.

Date of Startup:

The date this unit began operation could not be determined by facility representatives.

Date of Closure:

This unit was decommissioned in June 1988.

Wastes Managed:

This unit was used to collect waste lacquer (D001), waste thinner (D001), waste paint (D001 and D008), and waste solvents (D001, F002, F003, and F005) from the paint spray booth. Information regarding the disposition of these wastes was not provided by the facility.

Release Controls:

This concrete unit was located indoors. Other sumps within the facility led to the Former Wastewater Pretreatment System (SWMU 2).

History of Documented Releases:

There have been no documented releases from this unit.

Observations:

This unit was not observed during the VSI. It was decommissioned in June 1988, and the building was subsequently demolished.

SWMU 9

Former Hazardous Waste Collection Stations

Unit Description:

A total of 22 former hazardous waste collection stations were identified by the facility during the PA/VSI process. Each of these stations was a 55-gallon drum used to collect various hazardous waste materials. A list of the collection stations, their locations, and the most common waste materials collected is included in Attachment E.

Date of Startup:

The dates when these units began operating could not be

determined by facility representatives.

Date of Closure:

The dates when these units were decommissioned were not

provided by the facility. Operations at the facility ceased in 1987.

Wastes Managed:

These units were used to collect a variety of hazardous wastes, including waste lacquer (D001), waste thinner (D001), waste paint (D001 and D008), waste solvents (D001, F002, F003, and F005), waste adhesive (D001), waste solvent-soiled rags (D001), waste oils (D001), and waste caustic stripping compound (D001). The wastes collected at these stations were taken to the Former Hazardous Waste Drum Storage Pad (SWMU 1) for eventual off-site disposal.

Release Controls:

All of these units were located indoors on concrete floors. Sumps within the building drained to the Former Wastewater Pretreatment

System (SWMU 2).

History of

Documented Releases:

There have been no documented releases from these units.

Observations:

The collection stations were not observed during the VSI. The drums have been removed, and the buildings have been

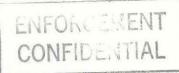
demolished.

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown on Figure 2.

AOC 1 PCB Transformer Containment Area

This concrete containment dike was located outside the former manufacturing building, and was used as an emergency containment dike for two transformers (in use until the facility buildings were demolished), each containing approximately 500-gallons of transformer oil (less than 500 parts per million PCBs). The containment dike is approximately 10 feet by 30 feet in size and approximately 2 feet deep. The area was covered with plywood and a polyethylene liner at the time of the VSI (see Photograph No. 9). Facility representatives stated that the material collected in the area noted during the VSI was rain water and organic debris. No leaks from the transformers were identified during the removal. Facility representatives stated that the transformers were removed on January 12, 1993. Information regarding the removal of the transformers is included in Attachment D. Samples of sludge, liquid, and a side scraping were collected at the time of the transformer removal to determine the proper disposal method for the material remaining in the containment area. These results are not yet available.



5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified nine SWMUs and one AOC at the GMC facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOC at the facility and the recommended further actions.

SWMU 1

Former Hazardous Waste Drum Storage Pad

Conclusions:

This unit was an outdoor, concrete area used for storage of hazardous wastes; however, wastes are no longer generated at the facility. There have been no documented releases from this unit, and no evidence of a release was observed during the VSI. The potential for a release to ground water, surface water, air, and on-site soils is therefore low.

Recommendations:

No further action.

SWMU 2

Former Wastewater Pretreatment System

Conclusions:

This unit was used to treat wastewater generated by the facility prior to its discharge to the sanitary sewer. The facility is no longer active, and most of the pretreatment system has been dismantled and removed. Some liquid was observed in concrete raceways and sumps that were open. The potential for a release to ground water, surface water, air, and on-site soils is low.

Recommendations:

The facility should characterize liquid observed in raceways and sumps, and properly remove and dispose of the liquid before completing the demolition of these areas.

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SWMUs 3 through 9

Conclusions:

None of these SWMUs were observed during the VSI because all of these units were decommissioned and removed in either 1987 or 1988. The buildings where these units were located have subsequently been demolished. The potential for release to ground water, surface water, air, and on-site soils is low because these units no longer exist. Facility representatives provided information documenting the cleaning and decommissioning of each of the units. According to this documentation, there have been no documented releases from any of these units.

Recommendations:

PRC recommends no further action for these units at this time.

AOC 1

PCB Transformer Containment Area

Conclusions:

This unit was a secondary containment structure for two PCB transformers. The transformer oil contained less than 500 parts per million PCBs. There is no evidence of any leaks from the transformers; and facility representatives stated that the material in the containment area was primarily rain water and organic debris. However, liquid accumulated in this concrete containment area has been sampled by the facility to determine if it contains any contaminants. The potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations:

The facility should complete the characterization of the liquid material in the containment area and properly remove and dispose of the liquid and containment structure.

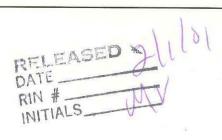




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TABLE 3 SWMU AND AOC SUMMARY

_	SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Former Hasardous Waste Drum Storage Pad	Late 1982 or early 1983 to 1987	None	None
2.	Former Wastewater Pretreatment System	Unknown to 1987	Unknown liquids in pits and raceways located in the wastewater treatment building	Characterize contents of raceways and sumps, properly remove and dispose of before completing demolition activities
3.	Former Waste Solvent Storage Tank	Unknown to May 1988	None	None
4.	Former Paint Sludge System	Unknown to July 1988	None	None
5.	Former Caustic Stripper Tank	Unknown to May 1988	None	None
6.	Former ELPO Paint Strainers and Bag Filters	Unknown to June 1988	None	None
7.	Former Solder Grind Roof Waste Vacuum Station	Unknown to March 1988	None	None
8.	Former Maintenance Department Paint Spray Booth Sump	Unknown to June 1988	None	None
9.	Former Hazardous Waste Collection Stations	Unknown to 1987 or 1988	None	None
	AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1.	PCB Transformer Containment Area	Unknown to present	None	Complete characterization of liquid material; properly remove and dispose of containment structure



REFERENCES

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- GMC, 1984. Letter from Thomas E. Clifford, GMC, to Karl J. Klepitsch, EPA, with Closure Certification Statement and Request For Change in Status, January 30.
- GMC, 1986. Letter from L.J. Tibbitts, GMC, to EPA with the Facility's 1985 Biennial Hazardous Waste Report, February 27.
- GMC, 1987. Letter from L.J. Tibbitts, GMC, to Tom Maki, MDNR, Indicating Facility Shutdown, June 23.
- GMC, 1993a. Letter from Beatrice Roehr, GMC Legal Staff, to Tim Oliver, PRC, with Response to Request for Facility Information, February 18.
- GMC, 1993b. Letter from Jefferey N. Braun, GMC Legal Staff, to Tim Oliver, PRC, with Additional Information Regarding the Fleetwood Facility, March 4.
- MDNR, 1983a. RCRA Inspection Report, March 15.
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- Mozola, A.J., 1969. Geology for Land and Ground-water Development in Wayne County Michigan, MDNR Report of Investigation 3.
- National Oceanic and Atmospheric Administration (NOAA), 1989. Local Climatological Data, Detroit Metropolitan Airport, Michigan.
- PRC., 1990. Meteorologist, National Weather Service, Communication with Patricia Murphy, PRC Environmental Management, Inc. (PRC), September 17.
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- PRC, 1993a. Telephone Conversation Between Tim Oliver, PRC, and Ben Okwunabua, Cheryl Howe, and Steve Buda of MDNR, January 9.

- PRC, 1993b. Telephone Conversation between Tim Oliver, PRC, and Beatrice Roehr, GMC Legal Staff, March 11.
- U.S. Department of Commerce (USDC), 1963. Rainfall Frequency Atlas of the United states, Technical Paper No. 40, U.S. Government Printing Office, Washington D.C.
- USDC, 1968. Climatic Atlas of the United States, U.S. Government Printing Office, Washington D.C.
- EPA, 1982. Letter from Karl J. Klepitsch, EPA, to B.J. Napolitan, GMC, regarding Identification Number Change, December 9.
- EPA, 1983. Letter from Karl J. Klepitsch, EPA, to C. Kato, GMC, with Denial of Part A Permit Application Withdrawal Request, September 8.
- EPA, 1984a. Verification of Receipt of Public Review Materials, March 11.
- EPA, 1984b. Letter from Karl J. Kleptisch, EPA, to B.J. Napolitan, GMC, Approving Closure and Change in Facility Status to Generator Only, April 26.
- U.S. Geological Survey (USGS), 1980. Detroit Quadrangle 7.5 Minute Series.
- USGS, 1983. Dearborn Quadrangle 7.5 Minute Series.
- USGS, 1989. Ground-water Flow and Quality Near the Upper Great Lakes Connecting Channels, Michigan.
- Wayne County Air Pollution Control Division (WCAPCD), 1986. Equipment Operation Certificates and Related Violation Notices.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



EPA FORM 2070-12(17-81)

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION						
01 STATE	02 SITE NUMBER					
MI	_MID 980,700 876					

PA	RT 1 - SITE INI	FORMATION A	ND ASSESSME	NI	МІ	1_MID 980.700.876				
II. SITE NAME AND LOCATION	; <u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>		·							
· · · · · · · · · · · · · · · · · · ·	on SITE NAME (Legal, common, or descriptive name of site) General Motors Corporation, Fisher Body Division, Fleetwood Plant				02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER West Fort Street and West End Avenue					
03 CITY Detroit	,	04 STATE MI	05 ZIP CODE 48209	06 COUNTY Wayne	07 COUNTY CODE	08 CONG DIST				
09 COORDINATES: LATITUDE 42° 17' 50" N		700000000000000000000000000000000000000								
10 DIRECTIONS TO SITE (Starting from nearest public re	oad)									
III. RESPONSIBLE PARTIES						- August - A				
01 OWNER (If known) Fort Street Properties, Inc.			ET <i>(Business, meili</i> 10 Harper Aven							
03 CITY Harper Woods		04 STATE MI	05 ZIP CODE 48225	06 TELEPHONE (313) 884						
07 OPERATOR (if known and different from owner) No current operator	7/10/2008E	08 STRE	ET (Business, meili	ing, residential)		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
09 CITY		10 STATE	11 ZIP CODE	12 TELEPHONI	NUMBER					
13 TYPE OF OWNERSHIP (Check one) A. PRIVATE B. FEDERAL: (Agency (Specify)	Name)	C. ST.		. COUNTY	O E. MUNICIP	AL				
14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all B. A. RCRA 3010 DATE RECEIVED: 08 / 18 / 80 MONTH DAY YEAR		ROLLED WASTE S	TE (CERCLA 103	c) DATE RECEIV	/ED:// MONTH DAY					
IV. CHARACTERIZATION OF POTENTIAL HAZA	RD									
O1 ON SITE INSPECTION BY (Check all A. EPA X YES DATE 01/20/93		A CONTRACTOR H OFFICIAL	C. STATE		O. OTHER CONTR	ACTOR				
CONTRACTOR	NAME(S):PRC			nc. (PRC)						
O2 SITE STATUS (Check one) □ A. ACTIVE 陽 B. INACTIVE □ C.UNKN	own		ERATION Known 1 1987 NNING YEAR ENDING	O YEAR	UNKN	OWN				
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, A	NOWN, OR ALLEG	ED								
Lead from waste paint (D008), waste plating slu	idge (F006), wa	aste thinner (DO	001), and PCBs	(less than 50	Oppm)					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONME	NT AND/OR POPU	LATION		· · · · · · · · · · · · · · · · · · ·		***************************************				
This facility is closed and all structures have or will be demolished. Material remaining in Wastewater Pretreatment System tanks and PCB Transformer Containment Area need to be investigated. The disposition and condition of three underground storage tanks at the facility are unknown.										
V. PRIORITY ASSESSMENT										
01 PRIORITY FOR INSPECTION (Check one. If high or med	ium is checked, co	mplete Part 2 - Wi	este information an	ed Part 3 - Descrip	otion of Hazardous	s Conditions and Incidents.)				
□ A. HIGH □ B. MEDIUM (Inspection required promptly) (Inspection required)	图 C. LC (Inspect o)W on time-available b	D. NON	_	complete current	disposition form)				
VI. INFORMATION AVAILABLE FROM			<u></u>							
01 CONTACT Kevin Pierard	02 OF (Agency/ U.S. EPA	-				03 TELEPHONE NUMBER (312) 886-4448				
04 PERSON RESPONSIBLE FOR ASSESSMENT Tim Oliver	05 AGENCY	06 06	IGANIZATION PRC	07 TELEPHO (615)	NE NUMBER 256-1191	08 DATE 02 / 20 / 93				

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Former
General Motors Corporation
Fisher Body Division, Fleetwood Plant
Detroit, Michigan
MID 980 700 876

Date:

January 19, 1993

Primary Facility Representative:
Representative Telephone No.:

Representative Telephone No.: Additional Facility Representatives:

Warner Johnson, Field Operations Manager

(313) 884-1600

Terrance Conway, General Motors Legal Staff

(313) 974-1154

Tom Vigliotti, Fort Street Properties, Inc. (Current property

owner representative, not present at inspection)

(313) 567-4480

Inspection Team:

Tim Oliver, PRC Environmental Management, Inc. (PRC)

Randy Futrell, PRC

Photographer:

Tim Oliver, PRC

Weather Conditions:

Cold, sunny, about 20 degrees Fahrenheit, 2 to 3 inches of snow and ice on the ground

Summary of Activities:

The visual site inspection (VSI) began at 1:50 p.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations. Facility representatives provided the inspection team with copies of available information.

The VSI tour began at 2:08 p.m. at the Former Wastewater Pretreatment System (SWMU 2) building. No information was available at the time of the VSI on the location of the Former RCRA Container Storage Area (SWMU 1); however, the inspection team and facility representatives made a complete tour of the property, including a stop at the PCB Transformer Containment Area (AOC 1). Most of the site is currently covered in large piles of rubble. The parts of the facility not covered in rubble appeared to be mostly concrete and asphalt; however, these areas were largely obscured by the 2 to 3 inches of snow on the ground. No evidence of any release was noted outside the SWMUS or AOC.

The group then left the main section of the facility to inspect Building 7. This two-floor building was empty.

The tour concluded at 2:50 p.m, and arrangements were made to obtain additional information, and the VSI was completed. The inspection team then left the facility at 3:00 p.m.



Location: Eastern Fenceline Photograph No. 1 Date: 01/19/93 Orientation: Northwest

Description: View of empty lot and demolition debris remaining at the facility.



Photograph No. 2
Orientation: West Northwest
Description: View of empty lot and demolition debris at the facility. Location: Eastern Fenceline Date: 01/19/93



Photograph No. 3

Location: Eastern Fenceline Date: 01/19/93

Orientation: West
Description: View of empty lot and demolition debris at the facility.



Photograph No. 4 Orientation: Southwest

Location: Eastern Fenceline

Date: 01/19/93

Description: View of empty lot and demolition debris at the facility.



Photograph No. 5 Orientation: Northwest
Description: Demolition debris left at the facility.

Location: Entrance Area Date: 01/19/93



Photograph No. 6 Orientation: North Northwest

Demolition debris remaining at the facility. Description:

Location: Entrance Area Date: 01/19/93



Photograph No. 7 Orientation: West Location: SWMU 2 Date: 01/19/93

Inside Former Wastewater Pretreatment System building. Note open pits and raceways in the floor. Description:



Photograph No. 8 Orientation: South Southeast Location: SWMU 2 Date: 01/19/93

Description: Filled tanks in the floor of the Former Wastewater Pretreatment System building.



Photograph No. 9

Orientation: South Southwest
Description: PCB Transformer Containment Area covered by plywood and polyethylene liner.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

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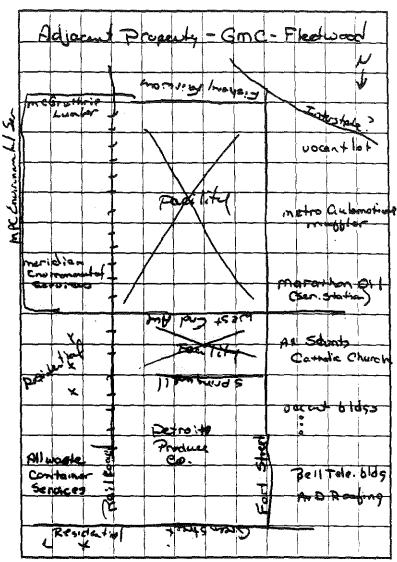
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ATTACHMENT D
PCB TRANSFORMER DISPOSAL INFORMATION

LETTER OF TRANSMITTAL

FORT STREET PROPERTIES, INC. 19550 HARPER AVENUE HARPER WOODS, MI 48225 (313) 884-1600 - (313) 884-3425 FAX

TO: PRC ENVIRONMENTAL MANAGEMENT, INC.

WASHINGTON SQUARE

214 SECOND AVENUE NORTH, SUITE 200

NASHVILLE, TN 37201

DATE:

FEBRUARY 2, 1993

ATTN:

TIMOTHY J. OLIVER

RE:

GENERAL MOTORS

OLD CADILLAC PLANT

He are sending you the following items:

Copies	DATE	DESCRIPTION
~~~~	****	***************************************
1	01-12-93	UNIFORM HAZARDOUS WASTE MANIFEST #MI 2934979
1	01-12-93	Non-Hazardous Waste Manifest #NHW01
1	01-15-93	CONFIRMATION OF RECEIPT
1	01-12-93	Non-Hazardous Waste Manifest #NHW02
1	01-15-93	CONFIRMATION OF RECEIPT



### THESE ARE TRANSMITTED AS CHECKED BELOW:

- FOR APPROVAL FOR YOUR USE
- AS REQUIRED
- FOR REVIEW AND COMMENT

#### REMARKS:

THE ENCLOSED MANIFEST(S) ARE SUBMITTED AS PER YOUR REQUEST TO WARNER JOHNSON. SHOULD YOU HAVE THE NEED FOR ANY ADDITIONAL INFORMATION, PLEASE DO NOT HESITATE TO CONTACT OUR OFFICE.

MICHELLE A. HUNTER FOR SIGNED: FORT STREET PROPERTIES. INC.

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# DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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## Environmental Protection Services, Inc.

4 Industrial Park Drive P.O. Box 710 Wheeling, West Virginia 26003-0091

# **CONFIRMATION OF RECEIPT**

This is to confirm that your transformers picked up on the
124 day of Thurry, 1993 and listed on the / pages that
make up the Environmental Protection Services pickup sheet identified by
number 930095 have arrived at the EPS facility in Wheeling,
West Virginia, on this 15-H day of TANNARY, 1997 and have
been placed in storage awaiting processing.

You will receive a Certificate of Completion within 60 days indicating that all work has been performed in accordance with the terms and conditions of our contract.

SIGNATURE OF EPS REPRESENTATIVE

and Control for the control fo					
WASTE MANIFEST MID 9	rs US EPA ID No	2. Page 1 of 1	NHW	) 2	
	RAL MOTORS FISHER BODY	1		-	
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18. Transporter 2 Acknowledgement of Receipt of Materials	James	Lule	*	1/3	2/2
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19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of waste	materials covered by this manifest except as no	oted in Item 19.	,		
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# Environmental Protection Services, Inc. 4 Industrial Park Drive P.O. Box 710 Wheeling, West Virginia 26003-0091

# CONFIRMATION OF RECEIPT

This is to confirm that your transformers picked up on the
12 4 day of TANUARY, 1993 and listed on the pages that
make up the Environmental Protection Services pickup sheet identified by
number 930096 have arrived at the EPS facility in Wheeling,
West Virginia, on this 15 H day of JANWARY, 1993 and have
been placed in storage awaiting processing.

You will receive a Certificate of Completion within 60 days indicating that all work has been performed in accordance with the terms and conditions of our contract.

Daloe SIGNATURE OF EPS REPRESENTATIVE

ATTACHMENT E
FORMER WASTE COLLECTION STATIONS (SWMU 9)

#### BUICK-OLDSMOBILE-CADILLAC GROUP GENERAL MOTORS CORPORATION FLEETWOOD PLANT DETROIT, MICHIGAN

### WASTE SOLVENT COLLECTION STATIONS

Designator Code: Building No. - Floor No. - Column No.

No.	Designator	Location	Most Common Materials Collected	Department Responsible for Station
1	6-6-A41	Repair Crib	Acrylic Repair Thinner	Maintenance
2	6-6-D21	Solvent Crib	SnoSol 131-R	Trim & Hardware
3	6-6-E02	Repair Crib	SnoSol 131-R	Maintenance
4	6-4-B31	Solvent Crib	SnoSol 131-R	Trim & Hardware
5	6-2-D23	Solvent Storage	Fabric Cleaner FS-1228, Bright View Windshield Solvent	Trim & Hardware
6	6-1-C06	Column by Ramp	Isopropyl Alcohol, Product Sol #310	Jig & Fixture
7	4-1-H21	Pump Repair Crib	Acrylic Cleaning Thinner 1631	Maintenance
8	4-1-F14	Repair Spray Booth	Xylol, Waste Paint	Maintenance
9	4-1-F13	Millwright Shop	Contact Clean	Maintenance
10	4-1-G07	Machine Repair Shop	1,1,1-Trichloroethane	Maintenance
11	4-1-M02	Maintenance Supply	E-Z Strip, Chem Kleen #224	Maintenance
12	22-1-016	Fork Lift Repair	Waste Oil	Maintenance
13	22-1-015	Fork Lift Repair	Zip Cleaner	Maintenance
14	22-1-P03	Wash Deck	Kerosene, Power Clean #206	Maintenance
15	22-1-P04	Tractor Repair Bay	Waste Oil, Waste Hydraulic Fluid	Maintenance
16	5-1-K01	Paint Mix Room	Waste Paint, Waste Thinner	Paint
17	5-1-G09	Jig & Fixture Machine Rm.	Waste Oil	Jig & Fixture
18	4-2-J15	Spray Training Booth	Acrylic Repair Thinner, Waste Paint	Paint
19	5-2-M03	Oil Sand Area	Oil Sand Solvent, Waste Paint	Paint
20	5-2-M08	Wet Sand Area	Solvent GS-340	Paint
21	5-3-н04	ELPO Area	Cellosolve Acetate, Butyl Cellosolve	Maintenance
22	PH-1-West	Power House Repair Area	Contact Clean	Power House



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

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REPLY TO THE ATTENTION OF:

HRE-81

January 8, 1992

Mr. Tom Vigliotti Fisher Body Fleetwood 1900 East Jefferson Avenue Detroit, MI 48207

Re:

Visual Site Inspection Fisher Body Fleetwood Detroit, MI ID# MID 980 700 876

Dear Mr. Vigliotti:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for January 19, 1993, at 2:00 p.m. The inspection team will consist of Tim Oliver and Randy Futrell of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department of Natural Resources (MDNR) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

Mr. Tom Vigliotti January 8, 1992 Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours.

Kevin M. Pierard, Chief

Marcere D. Harrofer.

OH/MN Technical Enforcement Section

Enclosure

cc:

Terrance Conway, General Motors Legal Staff

Ben Okwunabua, MDNR